Supreme Court, U.S.
FILED
APR 18 1986
JOSEPH F. SPANIOL, JR.
CLERK

85-2140 (1)

IN THE

SUPREME COURT OF THE UNITED STATES

TERM: FEBRUARY, 1986

EMILIA DINOLA

PETITIONER

v.

AMERICAN CYANAMID, CARRIER CLINIC,
ROBERT JAMES STEWART,
WILLIAM F. OTIS, JR., et als,

RESPONDENTS

PETITION FOR WRIT OF CERTIORARI TO
THE UNITED STATES COURT OF APPEALS
FOR THE THIRD CIRCUIT

Emilia DiNola
302 Westmoreland Drive
Trenton, New Jersey, 08618

Tele: 609-883-1961

1/5 pp & folders

QUESTIONS FOR AMERICAN CYANAMID AND ROBERT JAMES STEWART

1- WHAT RIGHT HAS A CORPORATION TO EXPERIMENT ON THEIR UNSUSPECTING EMPLOYEES WITH THEIR PRODUCTS OR ANY OTHER?

2- WHAT RIGHT HAS A CORPORATION TO HYPNOTIZE AND CHEMICALLY DRUG EMPLOYEES TO INDUCE HYPNOSIS?

3- WHAT RIGHT HAS A CORPORATION TO HARASS EMPLOYEES AT WORK? HOME? SOCIALLY? ON EMPLOYEES OWN TIME?

4- WHAT RIGHT HAS A COMPANY'S PHYSICIAN TO HARASS EMPLOYEES WHILE GIVING THEM THEIR PHYSICAL EXAMINATION?

5- WHAT RIGHT HAS A CORPORATION TO MANIPULATE EMPLOYEES BY INTERFERRING IN THEIR PRIVATE LIVES?

6- WHAT RIGHT HAS A CORPORATION TO CALL ATTORNEYS TO REFUSE REPRESENTATION FOR EMPLOYEES' COMPLAINT FOR SUIT OF ACTION?

7- (a) STATE AGENCIES?

7- WHAT RIGHT HAS A CORPORATION TO SPEW CHEMICALS AND OBNOXIOUS ODORS ON THEIR EMPLOYEES THROUGH DUCT WORK?

8- WHAT RIGHT HAS A CORPORATION TO DEFAME AND LIE CONCERNING EMPLOYEES' EVALUATION IN ORDER TO FORCE EMPLOYEES TO SUBMIT TO HYPNOTIC TRANSMISSION, IN ORDER TO GOVERN THE EMPLOYEE'S LIFE?

9- WHAT RIGHT HAS ANY CORPORATION TO DEPRIVE EMPLOYEES OF THEIR RIGHT TO FREEDOM, LIBERTY, AND RELIGION, TO LIVE THEIR OWN LIVES?

QUESTIONS FOR AMERICAN CYANAMID CON'T

10- BY WHAT REASON WAS EMILIA DINOLA TERMINATED FROM EMPLOYMENT AFTER EIGHT (8) YEARS?

11- WHY WASN'T EMILIA DINOLA GIVEN THE OPPORTUNITY TO DISCUSS HER COMPLAINT THAT WAS MADE IN OCTOBER, 1977?

12- DID YOU KNOW ROBERT JAMES STEWART HAD KNOWLEDGE OF HYPNOSIS?

13- DID YOU ASK HIM TO USE HYPNOSIS ON UNSUSPECTING EMPLOYEES?

14- DO YOU MAKE IT A PRACTICE TO TAP EMPLOYEES' TELEPHONE CALLS?

15- IF SO, WHY?

16- WHAT RIGHT HAS A COMPANY TO INVADE THE PRIVATE LIVES OF THEIR EMPLOYEES?

17- ARE MELLARIL, LIBRIUM AND THORAZENE PRODUCTS OF AMERICAN CYCNAMID?

18- WAS THE COMPANY PHYSICIAN, DR. GEORGE MINSCHWANER INSTRUCTED TO HARASS EMPLOYEES DURING THEIR PHYSICAL EXAMINATION?

19- WHO UNDRESSED ME, WHY, AND WHAT WAS DONE TO ME AFTER I WAS BROUGHT TO THE INFIRMARY AFTER BEING DRUGGED?

20- WHY WEREN'T MY MEDICAL RECORDS SENT TO ME WHEN I REQUESTED THEM?

QUESTIONS FOR ROBERT JAMES STEWART

1- WHEN DID YOU START WORKING FOR AMERICAN CYCNAMID?

2- DID THE COMPANY KNOW YOU HAD KNOWLEDGE OF HYPNOSIS?

3- WERE YOU ASKED TO USE HYPNOSIS ON THE UNSUSPECTING EMPLOYEES?

4- IF SO, BY WHOM? WHY?

5- WHY DID YOU DRUG MY COFFEE IN 1973/

6- WHAT BENEFIT DO YOU GET OUT OF HYPNOTIZING PEOPLE?

7- WHY DID YOUR WIFE PASS HERSELF AS AN ATTORNEY JULY 5,1974 AT 12:00 NOON ON MARKET STREET,AS ATTORNEY, LINDA LENGYL?

QUESTIONS FOR WILLIAM F. OTIS, JR. AND CARRIER CLINIC

1- WHY WAS SEVEN (7) ELECTRIC SHOCKS GIVEN?

2- NAME DATES AND TIME OF ELECTRIC SHOCKS?

3- NAME, DATE, TIME, PLACE OF HEARING, ;973?

4- WAS A HEARING AFTERTHE COMMITTMENT?

5- NAME JUDGE AND PANEL TO AUTHORIZE COMMITTMENT?

6- FOR WHAT REASON?

7- WHY WEREN'T RELATIVES AND PATIENT PRESENT AT HEARING?

8- WAS A HEARING GIVEN AFTER SHOCK TREATMENT?

9- WHY WAS PATIENT THREATENED AFTER CALLING AN ATTORNEY?

10- NAME ATTORNEY MENTIONED IN MEDICAL REPORT?

11- SHOW CONSENT FORM OF ATTORNEY FOR SHOCK T REATMENT?

12- SHOW TWO(2) REQUIRED CERTIFICATES OF TWO (2) PHYSICIANS FOR COMMITTMENT.

13- WHY WEREN'T THE CERTIFICATES GIVEN TO A RELATIVE OR PATIENT?

14- WHO RECCOMENDED WILLIAM F. OTIS, JR.?

15- WAS WILLIAM F. OTIS, JR. AFFILIATED WITH AMERICAN CYANAMID?

QUESTIONS FOR WILLIAM F. OTIS, JR. AND CARRIER CLINIC CON'T.

(a) IF SO HOW?

16- WHY WERE LARGE DOSES OF MELLARIL AND THORAZENE GIVEN TO EMILIA DINOLA?

17- IS WILLIAM F. OTIS, JR., FAMILIAR WITH HYPNOSIS?

18- DOES WILLIAM F. OTIS, JRS., USE HYPNOSIS ON HIS PATIENTS?

19- WHAT RIGHT HAS WILLIAM F. OTIS, JR., TO USE HYPNOSIS ON EMILIA DINOLA'S SISTER DURING OUTPATIENT VISIT IN 1974 /

DEFENDENTS

1- American Cyanamid
Quakerbridge Road
P.O. Box 400
Plainsboro, N.J.
Mercer County
Telephone: 799-0400

2- Carrier Clinic
Belle Meade, N.J.
Somerset County
Telephone: 291-874-4000

3- Robert James Stewart
17 Carteret
West Milford, N.J.
Telephone: 1-201-728-9496

4- William F. Otis, Jr.
Carrier Clinic
Belle Meade, N.J.
Somerset County
Telephone : 1-291-874-4000

BEST AVAILABLE COPY

P 125 149 163

RECEIPT FOR CERTIFIED MAIL

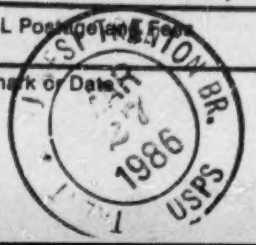
NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL

(See Reverse)

Sent to WM P SHELLY + COPITNEY HARDIN, KIPP Szuch	
Street and No. 163 MADISON AVE CN 1945	
P.O., State and ZIP Code MORRISTOWN, N.J. 07960	
Postage	$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to whom and Date Delivered	
Return receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	$ 2.69
Postmark or Date	

* U.S.G.P.O. 1984-446-014

PS Form 3800, Feb. 1982



P 125 149 162

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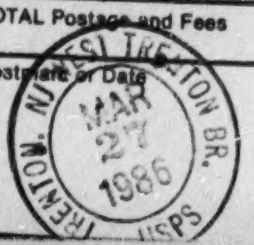

APPENDEX

QUESTIONS FOR AMERICAN CYCNAMID AND ROBERT JAMES STEWART

QUESTIONS FOR CARRIER CLINIC AND WILLIAM F. OTIS, JR.

SUBSIDERIARIES OF AMERICAN CYCNAMID

PETITION FOR CERTIORARI

AMENDMENTS

FEDERAL DISTRICT COURT DECISION

UNITED STATES COURT OF APPEALS FOR THE THIRD CIRCUIT DECISION

LETTERS REGARDING OPPOSING ATTORNEYS

CASE SUMMARY

COPY OF CERTIFICATE OF CERTIFICATION OF CARRIER CLINIC

CIVIL PRACTICE RULES 4:74.7

COPIES OF LETTERS FOR LEGAL REPRESENTATION
(only a few listed)

NAMES AND ADDRESSES OF DEFENDENTS

COPIES OF CERTIFIED RECEIPTS RETURNED FORM DEFENDENTS FOR FEDERAL DISTRICT COURT AND UNITED STATES COURT OF APPEALS FOR THE THIRD CIRCUIT

IN THE

SUPREME COURT OF THE UNITED STATES

FEBRUARY, 1986

EMILIA DINOLA

PETITIONER

vs.

AMERICAN CYCNAMID, CARRIER CLINIC
ROBERT JAMES STEWART,
WILLIAM F. OTIS, JR., et als,

RESPONDENTS

PETITION FOR WRIT OF CERTIORARI TO THE UNITED STATES COURT OF APPEALS FOR THE THIRD CIRCUIT COURT.

THE PETITIONER, EMILIA DINOLA RESPECTFULLY PRAYS THAT A WRIT OF CERTIORARI TO REVIEW ANSWER TO PETITION FILED MAY 51,1985 OF THE UNITED STATES DISTRICT COURT, DISTRICT OF NEW JERSEY, AND THE UNITED STATES COURT OF APPEALS FOR THE THIRD CIRCUIT.

JURISDICTION

THE UNITED STATES DISTRICT COURT ENTERED ITS DECISION MAY 22, 1985 STATING: COMPLAINT WAS UNTIMELY AND DISMISSED WITH PREDJUDICE.

TWO)SCHEDULED HEARINGS WERE SCHEDULED, DATED AUGUST 27, 1985 AND NOVEMBER 18,1985. THE PETITIONER A' EARED AT BOTH HEARINGS AND WAS TOLD NOTHING WAS SLATED.

THE PETITIONER ENTERED AN APPEAL FOR "AS OF RIGHT" TO AN ORAL HEARING TO THE UNITED STATES COURT OF APPE LS FOR THE THIRD CIRCUIT. THE APPEAL WAS DENIED.

CONSTITUTIONSL PROVISION INVOLVED

NEW JERSEY CONSTITUTION "AS OF RIGHT" TO AN ORAL HEARING IN THE COURT OF APPEALS, PAGE 177.

BILL OF RIGHTS # 39

EVERY CITIZEN HAS THE ABSOLUTE RIGHT TO PERSONAL FREEDOM, RE'UTATION.

PHYSICIAN RULES AND CODE

GEORGE MINSCHWANER, COMPANY PHYSICIAN GUILTY OF UNPROFESSIONAL CONDUCT AS IMPLEMENTED AND DEFINED BY:

RULES OF THE COMMISSION FILED PURSUANT TO THE STATE IN THE OFFICE OF THE SECRETARY OF

STATE UNDER TITLE 8 PART 60.1 SUB D & OF THE OFFICIAL CODES AND RULES, REGULATIONS OF THE STATE OF NEW YORK, IMMORAL CONDUCT OF A PHYSICIAN IN HIS PRACTICE AS A PHYSICIAN.

BILL OF RIGHTS # 39

EVERY CITIZEN HAS THE ABSOLUTE RIGHT TO PERSONAL FREEDOM, REPUTATION.

1- UNITED STATES CONSTITUTION: AMENDMENT 1
NO LAW RESPECTING AS ESTABLISHMENT OR RELIGION OR PROHIBITING THE FREE EXERCISE THEREOF OR ABRIDGING THE FREEDOM OF SPEECH OR OF THE PRESS, OR THE RIGHT OF THE PEOPLE, PEACEABLY A SEMBLE AND TO PETITION THE GOVERNMENT FOR RE DRESS OR GRIEVANCE.

2- UNITED STATES CONSTITUTION: AMENDMENT VII
WHERE THE VALUE IN CONTROVERSY SHALL EXCEED TWENTY DOLLARS '20.00) THE RIGHT OF TRIAL BY JURY SHALL BE OTHERWISE: RE-EXAMINED IN ANY COURT OF THE UNITED STATES THAT ACCORDING TO THE RULES OF THE COMMON LAW.

3-UNITED STATES CONSTITUTION: AMENDMENT V
NOR SHALL ANY PERSON. BE DEPRIVED OF LIFE, LIBERTY, PROPERTY WITHOUT DUE PROCESS OF LAW.

4-UNITED STATES CONSTITUTION: AMENDMENT XIII
INVOLUNTARY SERVITUDE (THIS CASE HYPNOSIS SHOCK TREATMENT, BRAINWASH)

5- UNITED STATES CONSTITUTION: AMENDMENT XIV
ALL PERSONS BORN OR NATURALIZED IN THE UNITED STATES AND SUBJECT OF THE JURISDICTION THEREOF, ARE CITIZENS OF THE UNITED STATES AND OF THE STATE WHEREIN THEY RESIDE; NO STATE SHALL MAKE OR ENFORCE , ANY LAW WHICH SHALL ABRIDGE THE PRIVILEGES OR IMMUNITIES OF CITIZENS OF THE UNITED STATES, NOR SHALL ANY STATE DEPRIVE ANY PERSON, LIFE, LIBERTY OR PROPERTY WITHOUT THE DUE PROCESS OF LAW, NOR DENY ANY PERSON WITHIN ITS JURISDICTION THE EQUAL PROTECTION OF ITS LAW.

THE PETITIONER ENTERED THIS PETITION FOR THE PURPOSE OF FILING IN COURT FOR LEGAL ACTION OF "AS OF RIGHT" FOR AN ORAL

HEARING, JUSTICE AND MONETARY COMPENSATION.

CONCLUSION

FOR ALL THE ABOVE REASONS AND STATUTES INVOLVED, THIS PETITION SHOULD BE GRANTED.

RESPECTFULLY,

Emilia Dinola

EMILIA DINOLA, PRO SE
302 WESTMORELAND DRIVE
TRENTON, NEW JERSEY, 08618

TELE: 609-883-1961

WILLIAM P. SHELLY &
STEPHEN H. SCHECHNER
c/O PITNEY, HARDIN, KIPP & SZUCH
163 MADISON AVENUE, CN 1945
MORRISTOWN, NEW JERSEY, 07960
ATTORNEYS FOR RESPONDENTS

STATE OF N.J.

SIGNED BEFORE ME THIS 9th DAY OF APRIL, 1986

Edna M. Grala

NOTARY PUBLIC OF N.J.
My Commission Expires Aug. 7, 1990

DAMAGES DOUGHT

1- SUFFERED DEPRIVATION OF LIBERTY TO LIVE OWN LIFE.

2- SUFFERED MENTAL AND PHYSICAL ABUSE.

3- SUFFERED DRUG ABUSE.

4- SUFFERED INVASION OF PRIVACY.

5- UNAUTHORIZED EXPERIMENT AND USED AS A HUMAN FUINEA PIG. CONSPIRACY

6- SUFFERED MAL PRACTICE FROM PHYSICIANS.

7- SUFFERED HUMILIATION AND DEFAMATION OF REPUTATION.

8- SUFFERED DEPRIVATION OF PROPER LEGAL REPRESENTATION THROUGH ATTORNEYS AND STATE AGENCIES. PLUS AGGRAVATIONS.

THE PETITIONER REQUEST FOR DAMAGES:

TWO MILLION DOLLARS
PLUS COURT COSTS.

CONTENTS

COURT PAPERS

UNITED STATES APPEALS FOR THE THIRD CIRCUIT DECISION

UNITED STATES DISTRICT COURT DECISION

CONFERENCE SCHEDULING FOR UNITED STATES DISTRICT COURT

CERTIFIED RECEIPTS FOR OPPOSING DEFENDENTS' ATTORNEYS

BPS-64 JANUARY 8, 1986

UNITED STATES COURT OF APPEALS FOR THE
THIRD CIRCUIT

C.A. NO. 85-5756

EMILIA DINOLA, APPELLANT

vs.

AMERICAN CYANAMID, ET AL.

(D.N.J. CIV. NO. 85-1938)

PRESENT: GIBBONS, HIGGINBOTHAM AND
BECKER,

CIRCUIT JUDGES

SUBMITTED BY THE CLERK FOR POSSIBLE

DISMISSAL DUE TO A JURISDICTIONAL DE-

FECT.

IS THE ABOVE-CAPTIONED CASE.

RESPECTFULLY,

SALLY MRVOS (DAK)
CLERK

SM?DK?SB

ENC.

THE FOREGOING MOTION IS GRANTED

BY THE COURT,

JOS. GIBBONS

CIRCUIT JUDGE

DATED: JANUARY 29, 1986

AD/CC: MS. EDIN
WPS

OFFICE OF THE STAFF ATTORNEYS

UNITED STATES COURT OF APPEALS

FOR THE THIRD CIRCUIT

21716 UNITED STATES COURTHOUSE

PHILADELPHIA, PA. 19106

PAUL DOUGLAS SISK

SENIOR STAFF ATTORNEY

TELEPHONE
1215-597-2978

JANUARY 29, 1986

MS. EMILIA DINOLA

302 WESTMORELAND DRIVE

TRENTON, N.J, 08618

RE: DINOLA v. AMERICAN CYANAMID, ET AL.

G.A. NO. 85-5756

DEAR MS. DINOLA:

THIS WILL ACKNOWLEDGE RECEIPT OF YOUR LETTERS DATED JANUARY 17 AND 29, 1986, RECEIVED JANUARY 27, AND 24, 1986, RESPECTIVELY. YOUR "JANUARY 17" LETTER DEMANDS "ORAL ARGUMENT ABDOF RIGHT"

YOUR "JANUARY 29" LETTER INQUIRES WHEN THE HEARING WILL BE HELD.

ORAL ARGUMENT IS HEARD SOLELY AT THE DISCRETION OF THE COURT. STATE PROCEDURAL RULES DO NOT APPLY TO FEDERAL COURTS. IN THE EVENT ORAL ARGUMENT IS REQUIRED, YOU WILL BE ADVISED. MEANWHILE, YOUR CASE WAS SUBMITTED FOR POSSIBLE DISMISSAL DUE TO JURISDICTIONAL DEFECT, JANUARY 9, 1986. I AM NOT AWARE OF ANY ORDER ENTERED AS OF THIS DATE.

VERY TRULY YOURS,

PAUL DOUGLAS SISK

SENIOR STAFF ATTORNEY

PDS:MSB
CC: WILLIAM F. SHELLEY, ESQ.
PITNEY, HARDIN, KIPP & SZUCH
153 MADISON AVENUE
CN 1945
MORRISTOWN, N.J. 07960-1945

UNITED STATES DISTRICT COURT

DISTRICT OF NEW JERSEY

EMILIA DINOLA
PLAINTIFF

vs.

CIVIL ACTION
NO. 85-1938

AMERICAN CYCNAMID, CARRIER CLINIC, ROBERT JAMES STEWART, WILLIAM F. OTIS, JR., ET ALS,

APPEAL FOR AN ORAL HEARING

DEFENDENTS

THIS APPEAL IS FOR AN ORAL HEARING.

JUDGMENT CANNOT JUSTIFIABLY BE VALID

WITHOUT AUDIBLE STATEMENTS CONCERNING

THE CASE

PRO SE

EMILIA DINOLA
302 WESTMORELAND
DRIVE
TRENTON, NEW JERSEY,
08618

ORIGINAL HELD
PLAINTIFF

ALLYN Z. LITE

EMILIA DINOLA

PLAINTIFF

vs.

AMERICAN CYANAMID, ET ALS

DEFENDENT

TO: SEE ATTACHED SHEET

CIVIL NO. 85-0372 (MTB)

ORDER

NON JURY

FILED

JUN 7 1985
at 8:30
ALLYN Z. LITE

ORDER FOR SCHEDULING CONFERENCE

IT IS ON THIS 7TH DAY OF JUNE, 1985 ORDERED, PURSUANT TO F.R. CIV. P 16, AS AMENDED, THAT A SCHEDULING CONFERENCE TO BE HELD BEFORE THE HON. JOHN W. DEVINE ON AUGUST 27, 1985, AT 11;30 A.M. IN ROOM 258, UNITED STATES COURTHOUSE, TRENTON NEW JERSEY, AND IT IS FURTHER ORDERED THAT ALL PARTIES, INCLUDING THOSE INDIVIDUALS APPEARING PRO SE OR WITHOUT COUNSEL, SHALL APPEAR AT THE TIME AND PLACE INDICATED ABOVE, AND THAT AN ORDER BE ENTERED AT THAT CONFERENCE, WHICH ORDER SHALL STATE (1) THE TIME WITHIN WHICH DISCOVERY MUST BE COMPLETED, (2)

THE TIME WITHIN WHICH OTHER PARTIES MAY BE ADDED OR PLEADINGS AMENDED, (3) THE DATE OF THE NEXT OR FINAL PRETRIAL CONFERENCE AS APPROPRIATE, AND (4) ANY OTHER MATTER OR MATTERS WHICH IN THE CIRCUMSTANCES OF THE CASE APPEAR APPROPRIATE, INCLUDING A DATE WHICH ALL MOTIONS EXCEPT THE UNFORESEEABLE SHALL HAVE BEEN FILED. FINALLY, THE ATTENTION OF COUNSEL AND LITIGIANTS IS DIRECTED TO F.R. CIV. P 16 (F) WHICH PROVIDES THAT SANCTIONS MAY BE APPLIED IF COUNSEL OR AN INDIVIDUAL UNREPRESENTED BY COUNSEL EITHER FAILS TO APPEAR AT THE CONFERENCE MENTIONED ABOVE OR APPEARS UNPREPARED. THE ATTENTION OF COUNSEL IS INVITED TO LOCAL RULE 15, WHICH MUST BE SATISFIED.

ENTERED
ON
THE DOCKET

6-7 1985

ALLYN Z. LITE

JOHN DEVINE

UNITED STATES
MAGISTRATE

TO: EMILIA DINOLA
302 WESTMORELAND DRIVE
TRENTON, N.J. 08618
PLTF. PRO SE

PITNEY, HARDIN, KIPP
& SZUCH, ESQS.
CN 1945
MORRISTOWN, N.J. 07960
ATT'Y FOR DEFT. STEWART

STEPHEN H. SCHECHNER, ESQ.
966 S. SPRINGFIELD DR.
SPRINGFIELD, N.J. 07081
ATT'Y FOR DEFT. OTIS

302 WESTMORELAND DRIVE
TRENTON, NEW JERSEY, 08618
JANUARY 17, 1986

UNITED STATE COURT OF APPEALS

21400 U.S. COURTHOUSE

601 MARKET STREET

PHILADELPHIA, PA, 19106-1790

ATTENTION: CLERK MS. MRVOS RE: CIVIL ACTION
85-1938

"AS OF RIGHT"

DEAR MADAM:

ENCLOSED ORIGINAL AND TWO COPIES OF "AS OF RIGHT" TO AN ORAL HEARING.

VERY TRULY YOURS,

E. DINOLA

ENC.

C.R.R.

UNITED STATES COURT OF APPEALS

FOR THE THIRD CIRCUIT

EMILIA DINOLA

PLAINTIFF

vs.

AMERICAN CYCNAMID, CARRIER CLINIC, ROBERT JAMES STEWART, WILLIAM F. OTIS, JR., ET ALS,

DEFENDENTS

CIVIL ACTION NO. 85-1938

"AS OF RIGHT" FOR AN ORAL HEARING

IN THE STATE LAW OF NEW JERSEY I HAVE "AS OF RIGHT" TO AN ORAL HEARING IN THIS CASE.

PRO SE

EMILIA DINOLA
302 WESTMORELAND DRIVE
TRENTON, N.J., 08618

CONSETNT TO DISPOSITION OF

CIVIL CASE BY A MAGISTRATE

IN THE UNITED STATES DISTRICT COURT FOT

THE DISTRICT OF NEW JERSEY

EMILIA DINOLA

DOCKET NO. 85-1938
CIVIL ACTION

PLAINTIFF

vs. . . .

AMERICAN CYANAMID, ROBERT JAMES STEWART, CARRIER CLINIC, WILLIAM F. OTIS, ET ALS,

CONSENT TO PROCEED BEFORE A UNITED STATES MAGISTRATE

IN ACCORDANCE WITH THE PROVISIONS OF 28 U.S.C. § 636(C), THE PARTIES TO THE ABOVE-CAPTIONED CIVIL MATTER HEREBY WAIVE THEIR RIGHT TO PROCEED BEFORE A JUDGE OF THE UNITED STATES DISTRICT COURT AND CONSENT TO HAVE A UNITED STATES MAGISTRATE CONDUCT ANY AND ALL FURTHER PROCEEDINGS IN THE CASE (INCLUDING THE TRIAL) AND ORDER THE ENTRY OF JUDGMENT.

I CONSENT TO TRIAL BY MAGISTRATE .

EMILIA DINOLA

A [illegible] SHALL BE TAKEN TO [illegible]

ANY APPEAL SHALL BE TAKEN TO THE UNITED STATES COURT OF APPEALS FOR THIS JUDICIAL CIRCUIT, IN ACCORDANCE WITH 28 U.S.C. § 636 (C) (3) UNLESS ALL PARTIES FURTHER CONSENT, BY SIGNING BELOW TO TAKE ANY APPEAL TO A JUDGE OF THE DISTRICT COURT, IN ACCORDANCE WITH 28 U.S.C. § 636 (C) (4)

NOTE: RETURN THIS FORM TO THE CLERK OF COURT

ONLY IF IT HAS BEEN EXECUTED BY ALL PARITES TO THE CASE, DO NOT RETURN THIS FORM TO A DISTRICT JUDGE OR MAGISTRATE

RECEIVED
ALLYN Z. LITE, CLERK
MAY 28 2:40 A.M.'85
UNITED STATES DISTRICT COURT

SALLY MRVOS OFFICE OF THE CLERK
CLERK

UNITED STATE COURT OF APPEALS

FOR THE THIRD CIRCUIT

21400 UNITED STATES COURTHOUSE

601 MARKET STREET

PHILADLEPHIA, PA. 19106-1790

NOVEMBER 25, 1985

EMILIA DINOLA

302 WESTMORELAND DRIVE

TRENTON, N.J., 08618

RE: EMILIA DINOLA,

APPELLANT

vs.

AMERICAN CYANAMID,

CARRIER CLINIC,

ROBERT JAMES STEWART,

WILLIAM F. OTIS, JR., ETALS,

(D.C CIVIL NO. 85-1938)

NO. : 85-5756

DEAR MS. DINOLA:

THIS IS TO ADVISE YOU THAT THE APPEAL IN THE ABOVE CAPTIONED CASE WAS DOCKETED IN THIS COURT ON NOVEMBER 19, 1985 AT NO. 85-5756

PURSUANT TO RULE 10 (B), F.R.A.P. WITHIN TEN (10) DAYS OF THE FILING OF THE NOTICE OF APPEAL YOU MUST ORDER FROM THE COURT REPORTER THOSE PORTIONS OF THE TRIAL TRANSCRIPT WHICH RELATE TO THE ISSUES TO BE RAISED ON APPEAL. IF YOU HAVE NOT ALREADY DONE SO, YOU SHOULD GIVE THIS MATTER YOUR IMMEDIATE ATTENTION. WHEN THE RECORD IS COMPLETE FOR PURPOSES OF THE APPEAL AND HAS BEEN TRANSMITTED TO THIS OFFICE FROM THE DISTRICT COURT, YOU WILL RECEIVE A BRIEFING ORDER, WITHIN TEN (10) DAYS OF THE DATE OF THIS LETTER, THE FOLLOWING ENCLOSED FORMS MUST BE COMPLETED AND FORWARDED TO THIS OFFICE.

(1) ENTRY OF APPEARANCE FOR,

(2) CIVIL APPEAL INFORMATION STATEMENT
(TO APPELLANT ONLY)

(3) RULE 25 CORPORATE AFFILIATE/FINANCIAL

DISCLOSURE STATEMENT (ORIGINAL AND
(6) COPIES TO BE FILED.

WE URGE YOU TO GIVE THIS MATTER YOUR

IMMEDIATE ATTENTION.

VERY TRULY YOURS

SALLY MRVOS, CLERK

BY JACQUILIN A. SINIBALDI

DEPUTY CLERK

DIRECT DIAL 597-5011

SM. JAS:KS
ENCLOSURES
CC: PITNEY, HARDIN, KIPP & SZUCH
CN 1945
MORRISTOWN, N.J 07060

ALLYN Z. LITE, ESQUIRE CLERK

TRENTON, N.J.

UNITED STATES DISTRICT COURT

DISTRICT OF NEW JERSEY

EMILIA DINOLA, PLAINTIFF

vs.

AMERICAN CYANAMID, CARRIER CLINIC, ROBERT JAMES STEWART, WILLIAM F. OTIS, JR., ET ALS DEFENDENTS

CIVIL ACTION

NO. 85-1938

MOTION TO RE-OPEN CASE

REC'D
SEP 12 1985

ALLYN Z. LITE
CLERK

THIS MOTION IS MADE TO RE-OPEN THE CASE ACCORDING TO RULE 61 OF THE FEDERAL DISTRICT COURT RULES.

SINCE THE "CLERICAL MISTAKE" WAS MADE BY THE COURT, LEADINF ME TO BELIEVE ON AUGUST 27, 1985, A HEARING WAS TO BE HELD IN THE HONORABLE JUDGE JOHN DEVINE. ONLY TO FIND NO HEARING WAS SET ON MY APPEARANCE OF AUGUST 27, 1985 AT 11:30 A.M.

EMILIA DINOLA
[redacted] WESTMORELAND
TRENTON, N.J., 08618

NOT FOR PUBLICATION

FILED

MAY 22 1985

AT 8:30

ALLYN Z. LITE

UNITED STATES DISTRICT COURT

DISTRICT OF NEW JERSEY

EMILIA DINOLA,

PLAINTIFF

vs.

AMERICAN CYANAMID, CARRIER CLINIC, ROBERT JAMES STEWART, WILLIAM F. OTIS, JR., ET ALS

DEFENDENTS

CIVIL ACTION

NO. 85-1938

O P I N I O N

BARRY, DISTRICT JUDGE

ALTHOUGH NOT ASSERTING THAT THIS ACTION IS BROUGHT PURSUANT TO 42 U.S.C. §§ 1983 and 1985, IT APPEARS THAT EMILIA DINOLA, PLAINTIFF HEREIN, IS COMPLAINING OF VARIOUS VIOLATIONS OF HER CIVIL RIGHTS. THUS SHE ALLEGES THAT IN VIOLATION OF THE FIRST, FIFTH, SEVENTH, THIRTEENTH (WHICH SHE DEFINES AS INVOLUNTARY SERVITUDE DUE TO HYPNOSIS, SHOCK TREATMENT, AND BRAINWASH), AND THE FOURTEENTH AMEND-

MENTS. "BILL OF RIGHTS#39", AND PHYSICIAN RULES AND CODES". SHE WAS USED AS AN "UNAUTHORIZED EXPERIMENT" AND HARASSED BY DEFENDENT AMERICAN CYANAMID AND TWO OF ITS EMPLOYEES AND THEREAFTER INVOLUNTARILY AND IMPROPERLY COMMITTED TO DEFENDENT CARRIER CLINIC WHERE, AGAIN SHE WAS DRUGGED AND HARASSED.

ON JANUARY 29, 1985, THIS COURT DISMISSED WITHOUT PREJUDICE ON A VARIETY OT GROUNDS A PREVIOUS COMPLAINT BROUGHT PURSUANT TO TITLE VII OF THE CIVIL RIGHTS ACT OF 1964, 42 U.S.C. § 2000 E-5, AGAINST THESE SAME DEFENDENTS. IT WAS CLEAR IN THAT COMPLAINT WHAT IS SOMEWHAT LESS CLEAR IN THIS ONE, I.E, THAT PLAINTIFF WAS COMMITTED TO CARRIER CLINIC IN EARLY 1973, RELEASED THREE MONTHS LATER, RETURNED TO WORK AT AMERICAN CYANAMID, WAS IN CARRIER CLINIC ONE MONTH IN 1974,AND RETURNED TO WORK AT AMERICAN CYANAMID

BEST AVAILABL

WHERE SHE WAS LAST EMPLOYED ON OCTOBER 17,1977. NO EVENTS SUBSEQUENT TO THAT DATE ARE SET FORTH IN THIS OR IN THE PREVIOUS COMPLAINT. THIS COMPLAINT, TOO, WILL BE DISMISSED. EVEN IF THERE WERE THE REQUISITE "STATE ACTION" WHICH IS NEITHER ALLEGED NOR AT ALL APPARENT, THIS ACTION IS BARRED BY THE TWO YEAR STATUTE OF LIMITATIONS FOR PERSONAL INJURIES, N.J.S.A. 2A:14-2. SEE WILSON v. GARCIA , NO. 83-2146 SL.OP.(SUPREME COURT OF THE UNITED STATES APRIL 17,1985)

THE FIRST COMPLAINT WAS DISMISSED, IN PART, BECAUSE IT WAS UNTIMELY ALLEGING, AS IT DID, DISCHARGE FROM AMERICAN CYANAMID IN OCTOBER, 1977 AND AN E.E.O.C. CHARGE FILED ON MAY 15, 1978. THIS COMPLAINT IS DISMISSED AS WELL, BECAUSE IT IS UNTIMELY EVEN IF IT OTHERWISE STATED A CLAIM, WHICH THE COURT HAS GRAVE DOUBTS THAT IT DOES. WHILE PLAINTIFF MAY SINCERELY BELIEVE SHE HAS BEEN WRONGED,

LE COPY

HER CLAIM CANNOT NOW BE BROUGHT IN FEDERAL COURT AND CANNOT IN THE FUTURE "A FEDERAL CAUSE OF ACTION" BROUGHT AT ANY DISTANCE OF TIME' WOULD BE 'UTTERLY REPUGNANT TO THE GENIUS OF OUR LAWS: JUST DETERMINATIONS OF FACT CANNOT BE MADE WHEN, BECAUSE OF THE PASSAGE OF TIME, THE MEMORIES OF WITNESSES HAVE FADED OR EVIDENCE IS LOST. IN COMPELLING CIRCUMSTANCES, EVEN WRONGDOERS ARE ENTITLED TO ASSUME THAT THEIR SINS MAY BE FORGOTTEN." ID, AT 10 (CITATION OMITTED). THIS COMPLAINT IS DISMISSED WITH PREJUDICE. THE COURT WILL ENTER AN APPROPRIATE ORDER.

MARYANNE TRUMP BARRY

U.S.D.C.

DATED: MAY 22nd, 1985

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UNITED STATES DISTRICT COURT

DISTRICT OF NEW JERSEY

FILED

MAY 22 1985

EMILIA DINOLA

PLAINTIFF

vs.

AMERICAN CYANAMID, CARRIER CLINIC, ROBERT JAMES STEWART, WILLIAM F. OTIS, JR., ET ALS

CIVIL ACTION

NO. 85-1938

DEFENDENTS

THIS MATTER BEING OPENED TO THE COURT ON ITS OWN MOTION AND FOR THE REASONS EXPRESSED IN THIS COURT'S OPINION DATED MAY 22ND, 1985.

IT IS ON THIS 22ND DAY OF MAY, 1985 ORDERED THAT THE WITHIN COMPLAINT IS DISMISSED WITH PREJUDICE. NO COSTS.

MARYANNE TRUMP BARRY
U.S.D.J.

ENTERED

ON

THE DOCKET
ON 5-22 1985

BY K A M
(DEPUTY CLERK)

ALLYN Z. LITE, CLERK

UNITED STATES DISTRICT COURT

DISTRICT OF NEW JERSEY

EMILIA DINOLA, CIVIL ACTION

PLAINTIFF, NO. 85-0372

v. ORDER

AMERICAN CYANAMID, ET ALS, JAN 30,1985
CARRIER CLINIC, ET ALS, AT 8:30
ROBERT JAMES STEWART,
WILLIAM F. OTIS, JR., ALLYN Z. LITE

DEFENDENTS

THE COURT HAVING REVIEWED THE INSTANT COMPLAINT AND IT APPEARING TO THE COURT THAT THIS ACTION, BROUGHT PURSUANT TO TITLE VII OF THE CIVIL RIGHTS ACT OF 1964 42 § 2000E-5 FOR EMPLOYMENT DISCRIMINATION CONCERNS PLAINTIFF'S DISCHARGE FROM THE AMERICAN CYANAMID COMPANY ON OCTOBER 17,1977 AND AN E.E.O.C. CHARGE FILED BY HER ON MAY 15,1978 AND THUS, IS BARRED UNTIMELY: AND

IT IS FURTHER APPEARING THAT THE COMPLAINT SOES NOT ALLEGE AND DISCRIMINATION WITHIN THE CONTEMPLATION OF TITLE VII, AND

IT FURTHER APPEARING THAT NO CLAIM IS

STATED AGAINST DEFENDENT ROBERT JAMES STEWART AND NO CLAIM CAN BE STATED UNDER TITLE VII AGAINST DEFENDENTS CARRIER CLINIC AND ITS EMPLOYEE: WILLIAM F. OTIS, JR;

IT IS ON THIS 29TH DAY OF JANUARY, 1985 ORDERED THAT THE INSTANT COMPLAINT BE DISMISSED AGAINST ALL DEFENDENTS WITHOUT PREJUDICE TO THE RIGHT OF PLAINTIFF TO FILE A NEW COMPLAINT IF THESE DEFICIENCES CAN BE CURED.

ENTERED
ON

THE DOCKET
ON -30 1985

ALLYN A. LITE, CLERK

MARYANNE TRUMP BARRY,

U.S.D.J.

UNITED STATES DISTRICT COURT

DISTRICT OF NEW JERSEY

EMILIA DINOLA, CIVIL NO. 85-372 (MTB)

PLAINTIFF

NOTICE OF ALLOCATION

v.

AMERICAN CYANAMID, ET ALS, AND ASSIGNMENT

DEFENDENTS

PURSUANT TO RULE 11 OF THE GENERAL RULES OF THIS COURT, I HAVE ALLOCATED THE ABOVE-ENTITLED MATTER TO TRENTON

PLEASE FILE ALL PLEADINGS AND MAKE ALL MOTIONS RETURNABLE THERE.

THIS ACTION HAS BEEN ASSIGNED TO:

JUDGE MARYANNE TRUMP BARRY

FILED ALLYN Z. LITE, CLERK

JAN 25 1985 BY MARY B. WITREWSKI

AT 8:30 DEPUTY CLERK

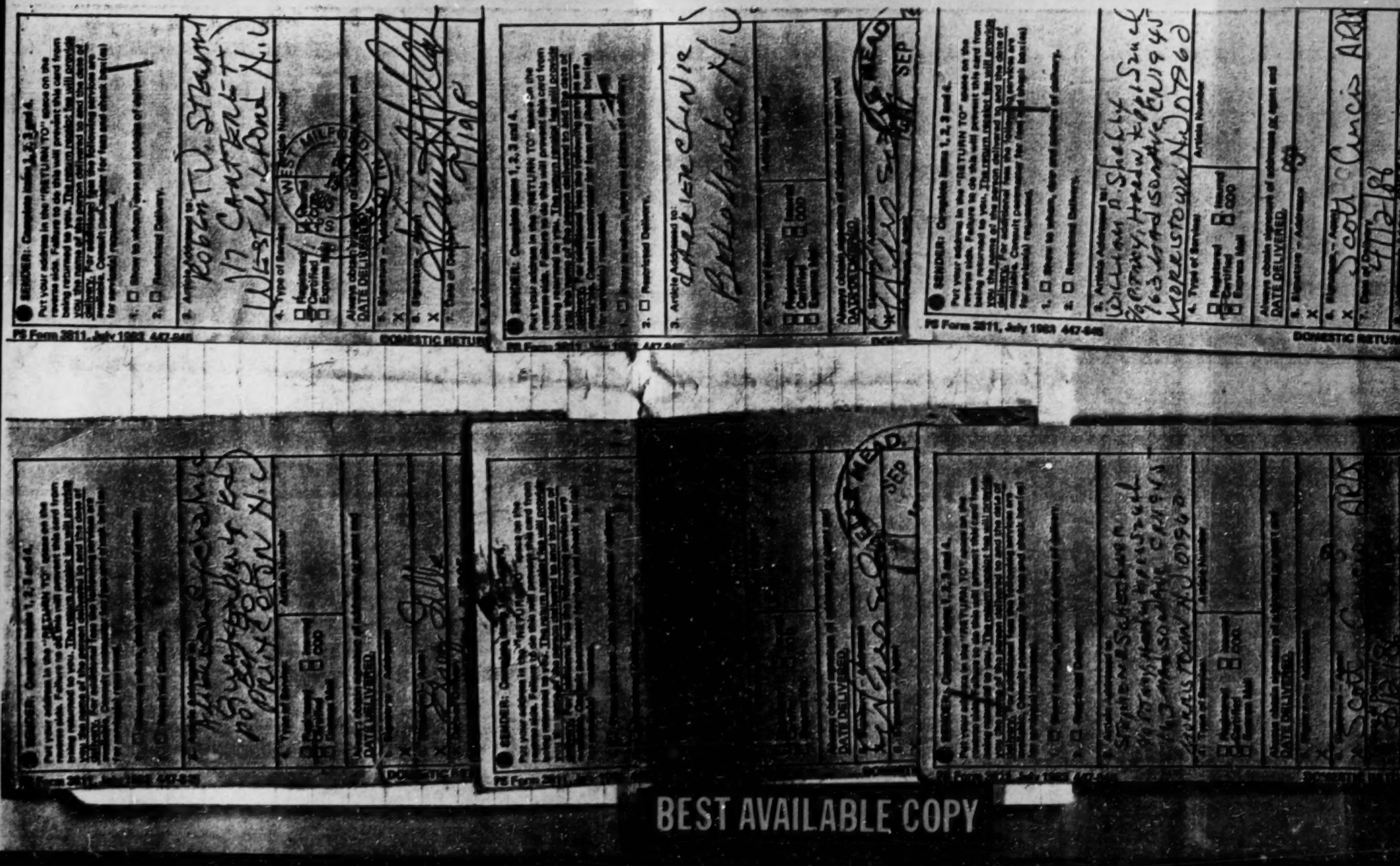
ALLYN Z. LITE

JANUARY 25, 1985

DATE

THE COURT HAS DIRECTED THAT COUNSEL BE INFORMED THAT THERE WILL BE STRICT

ENFORCEMENT OF GENERAL RULE 15 OF THE LOCAL RULES OF THIS COURT, (COMPLETION TO DISCOVERY PROCEEDINGS). AND SANCTIONS MAY BE IMPOSED FOR FAILURE TO COMPLY WITH THE RULE AND ORDERS ENTERED PURSUANT THERETO: INCLUDING DISMISSAL OF THE ACTION AND SUPPRESSION OF THE DEFENSE.



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DINOLA AMERICAN CYCNAMID CARRIER CLINIC
EMPLOYED BY AMERICAN CYCNAMID, LOCATED ON
QUAKERBRIDGE ROAD, PLAINSBORO, NEW JERSEY.
TERM: MARCH 25,1969 TO OCTOBER 17,1977.
BEFORE I BEGIN TO DISCUSS THIS CASE, I
WOULD LIKE TO ESTABLISH SOME FACTS:
OFFICE UNDERGROUND WITH ALL DUCT WORK,
ELECTRIC, VENTS HEATING AND AIR CONDITIONING
SYSTEMS IN THE CEILING. NO WINDOWS AND A
RETURN SYSTEM AT THE BACK OF THE ROOM.
DURING THIS ENTIRE PERIOD OF TIME, ODORS OF:
LINE, CHEMICAL ODORS, CHLOROFORM, MERCURIDE,
AT ONE POINT, BENZEDRINE (A HEAVY THICK
SICKENING ODOR) ANIMAL FECES, URINE, STEAM
VAPORS, DAMPNESS, EXTREME COLD TO THE POINT
WHERE IT WAS ALMOST IMPOSSIBLE TO HOLD A
PENCIL IN YOUR HAND.
THE ACCOUNTING AND BILLING SECTIONS WERE THE
ONLY SECTIONS WITHIN THE WHOLE BUILDING THAT
HAD MUSIC, MUSIC IN THE EARLY YEARS. 1972 WERE
"MARCHES" THAT WERE PLAYED REPEATEDLY. THEN
TAPES WERE PLACED, BUT CONTROLLED AND ON FM

STATIONS THAT CAN BE INTERCEPTED WITH A MICRO-
PHONE THAT CAN BE PURCHASED IN ANY TOY STORE.
NOTE: ALSO DURING THE HYPNOTIC TRANSMISSION,
IF THE VICTIM COMPLIED WITH THE HYPNOTIC
DEMANDS, THE SONG "YOU GO TO MY HEAD" PLAYED
AT TWO (2) OF THREE (3) MINUTE INTERVALS
(SOMETHING NO ORDINARY RADIO STATION DOES)
THEY ALSO TRIED TO BUILD HOSTILITY AMOUNG
THE EMPLOYEES, SO THAT EVERYONE THOUGHT THEY
WERE ISOLATED. HARASSMENTS, TELEPHONE TAPS ON
EMPLOYEES' CONVERSATIONS, REPEATED IN PART,
THROUGHOUT, WHERE EVER THE VICTIM WENT.
WHEN THE VICTIM COULD NOT BE HYPNOTIZED
ORDINARILY, CHEMICALS WERE USED TO INDUCE
HYPNOSIS, AS AN EXPERIMENT WITHOUT THE
AUTHORIZATION, CONSENT, OR VOLUNTARY BASIS.
CHEMICALS USED IN AMERICAN CYCNAMID

1- THORAZINE (PRODUCT OF AMERIC NCYCNAMID)

2- CHLOROFORM

3- BENEZEDRINE

4- AN ODD CONFECTIONARY SWEETNESS

DRUGS USED IN CARRIER CLINIC

LARGE DOSES OF:

1- THORAZENE (PRODUCT OF AMERICAN CYCNAMID)

2- MELLARIL

MARCH 25, 1969 I APPLIED FOR AN ACCOUNTING POSITION IN AMERICAN CYCNAMID, LOCATED ON QUAKERBRIDGE ROAD, PLAINSBORO, NEW JERSEY. IN NOVEMBER, 1970 I APPLIED AND GOT THE POSITION OF SUPERVISOR, I WAS THE ONLY EMPLOYEE IN THE ACCOUNTS PAYABLE AT THAT TIME. I WORKED ON A TWO (2) YEAR BACKLOG, LATER TAUGHT EMPLOYEES THE ACCOUNTING PROCEDURES. I GOT THE SYSTEM TO WORK ON A DAILY BASIS. AS EARLY AS JANUARY, 1972, I WAS BEING HARASSED. IN AUGUST, 1972, I TOOK THE REQUIRED PHYSICAL EXAMINATION BY THE COMPANY PHYSICIAN, GEORGE MINSCHWANER. THE EYE MACHINE WAS RIGGED, I TOLD THE NURSE. I DRESSED AND WENT INTO THE DOCTOR'S OFFICE AND HE SAID, "YOU CAN'T SEE, YOU'RE UNFIT FOR SUPERVISION". I REPLIED, "I CAN SEE OR I WOULDN'T BE ABLE TO DO MY WORK". I MADE AN APPOINTMENT WITH

WILLS EYE HOSPITAL IN PHILADELPHIA, PA.,WENT INTO THE DOCTOR'S OFFICE, TOOK THE EYE EXAMINATION, THE DOCTOR INDIGNANTLY ASKED, "WHO SENT YOU HERE?" I REPLIED, "THE COMPANY DOCTOR SAID, I COULDN'T SEE." HE REPLIED, "WELL YOU CAN SEE NOW." HE REQUESTED THE NAME OF THE DOCTOR, LEFT THE ROOM, CAME BACK, TOOK ME INTO ANOTHER ROOM, PUT A SMALL FLASHLIGHT INTO MY EYES. HE SAID NOTHING, PRESCRIBED NOTHING AND I LEFT. THIS WAS SEPTEMBER 22, 1972. APPROXIMATELY 10:30 A.M. I WAS TALKING TO A VENDOR OVER THE TELEPHONE AND SOMEONE GOT MY COFFEE FOR ME. MY COFFEE WAS DRUGGED. (KNOCK OUT DROPS) CHLORAL HYDRATE, I WAS THEN USHERED FROM THE ROOM BY TWO MEN, ONE WAS ROBERT JAMES STEWART, AN EMPLOYEE WHO SAT WITHIN TWO FEET OF ME (ALSO THE HYPNOTIST). A WITNESS, BARBARA DERISI, EMPLOYEE, SAID TWO STRANGE MEN, TOOK ME OUT. I WAS KNOCKED OUT BEFORE I REACHED THE DOUBLE DOORS THAT LED TO THE HALLWAY AND WAS PLACED IN THE ELEVATOR.

WHEN I CAME TO, I WAS VERY GROGGY AND FOUND MYSELF ZIPPING UP MY DRESS AND PUTTING ON MY SHOES. NOT KNOWING WHO UNDRESSED ME OR WHY. WHEN I WENT INTO THE DOCTOR'S OFFICE, HE REPLIED, "I COULD FINE YOU FOR THAT". I WAS STILL GROGGY AND ANGRILY REPLIED, "GO AHEAD. MY SISTER AND MOTHER PICKED ME UP. AN APPOINTMENT WAS MADE WITH A DOCTOR, DANIEL BOYLE, IN THE HALLWAY OF THE HELENE FULD HOSPITAL. (HE HAD AN OFFICE ON HAMILTON AVE.) IN TRENTON. I ANGRILY ASKED, "WHAT ARE WE DOING IN THE HALL?" HE REPLIED, "I COULDN'T GET A ROOM." I WAS ASKED MY NAME AND ADDRESS AND SPOKE INTO A DICTAPHONE. THIS IS NOT A VALID REASON FOR A COMMITTMENT TO CARRIER CLINIC. SEE RULE 4:74.7 OF CIVIL PRACTICE ENCLOSED. NO HAND WRITTEN COPIES OF CERTIFICATE OF TWO (2) PHYSICIANS, NEVER APPEARED AT A HEARING, NEITHER DID MY SISTER OR MOTHER, I WAS NEVER GIVEN THE RIGHT TO TESTIFY ON MY BEHALF.

AN APPOINTMENT WAS MADE TO GO TO CARRIER CLINIC, IN BELLE MEADE, NEW JERSEY UNDER THE CARE OF WILLIAM F. OTIS, JR., WHO WORKED IN THE RESEARCH AND DEVELOPMENT DEPARTMENT OF AMERICAN CYANAMID IN 1969 AND 1970. I WAS SIGNED IN AND IMMEDIATELY PLACED INTO LOCKED QUARTERS, WHERE A GUARD WOULD OPEN AND CLOSE THE DOORS. I WAS GIVEN A BRAIN SCAN, ELECTRODES PLACE INTO MY SKULL, AND OTHER TESTS. AS SOON AS THE DRUGS WORE OFF, I CALLED A FEMALE ATTORNEY, REGINE MEREDITH, (LOCATED AT 1009 SOUTH WARREN ST., TRENTON, N.J.) AND PLEADED WITH HER TO COME OUT. HER HUSBAND INTERRUPTED AND DIDN'T WANT HER TO COME OUT. WHEN I WENT BACK TO THE LOCKED QUARTERS, AND THEY FOUND OUT I HAD CALLED AN ATTORNEY, THE NURSE TOOK ME TO A LOCKED ROOM, WITHIN THE LOCKED QUARTERS AND THREATENED TO PUT ME IN THERE IF I DID THAT AGAIN. THE FOLLOWING MORNING I WAS GIVEN A SHOCK TREATMENT (UNNEEDED) AT 7:00 A.M.

THE AFTERNOON AFTER THE SHOCK TREATMENT A DARK HAIRED WOMAN WITH A MALE COMPANION. SHE SAT KNEE

TO KNEE WITH ME AND TALKED, I KNEW SHE WAS THERE BUT WAS UNABLE TO COMMUNICATE WITH HER BECAUSE OF THE SHOCK TREATMENT THAT BLANKS OUT YOUR MIND.

IN CARRIER I WAS CONSTANTLY FOLLOWED BY A SLIM BLONDE WOMAN, WHO QUOTED THE BIBLE.

AFTER A PERIOD OF TIME I WAS PLACED INTO ANOTHER SECTION, (LOCKED EATING PLACE), CALLED THE CATHERINE SECTION. BY THAT TIME I WAS HEAVILY DRUGGED (THEY USED, THORAZENE, LIBRIUM, MELLARIL, PRODUCTS OF AMERICAN CYCLAMID) AND GIVEN MORE SHOCK TREATMENTS FOR NO REASON.

WHEN MY SISTER AND MOTHER VISITED ME, THEY BROUGHT A BASKET OF FRUIT FROM THE EMPLOYEES.

AFTER MY FAMILY LEFT, A DARK HAIRED NURSE ENTERED MY ROOM AND SAID, "DON'T TOUCH THAT, IT BELONGS TO HER". (MEANING THE OTHER PATIENT)

IN MAY, 1973 I WAS RELEASED AFTER THREE MONTHS ON A SATURDAY AND THE FOLLOWING MONDAY WENT BACK TO WORK.

AFTER ONE MONTH OF WORKING THE HARASSMENTS BEGAN

WITH THE SO CALLED "PROGRESSIVE STEPS"

1- BLACK-NO MATTER WHERE YOU WENT, YOU HEARD BLACKES WERE DOIUNG THE THINGS THAT WERE BEING DONE. I WAS TOLD "BO ROBINSON" WAS DOING IT. ALBERT (BO) ROBINSON IS AFFILIATED WITH THE N.A.A.C.P.

2- SICKNESS- AGAIN NO MATTER WHERE YOU WENT, CONSTANT TALK OF SICKNESS.

3- RELIGION- THEY PLAYED GAMES WITH A GIRL NAMED "CATHY" (MEANING CATHOLIC) AND A GIRL NAMED "WILMA" (MEANING WILLS AND MOTHER) PASSING ME IN THE HALL, TOO OFTEN TO BE NATURAL. SINCE THEY WORKED ON THE FIRST FLOOR.

ROBERT JAMES STEWART STOOD BEHIND ME AND REPEATED PARABLES FROM THE BIBLE.

4- MARRIAGE- THE ULTIMATE PROGRESSIVE STEP. OLD WEDDING PICTURES WERE BROUGHT IN AND PASSED AROUND. WHEN ROBERT JAMES STEWART BECAME MY SUPERVISOR, ANOTHER EMPLOYEE NAMED "HOLLY" WAS TOLD TO SHOW THE PICTURES TO ME AFTER HER. "SHOW THE PICTURES TO EMILIA AFTER YOU, "HOLLY". THIS WAS

DURING THE CHRISTMAS WEEK. IN THIS STEP, IF THE VICTIM MARRIED, THEY WERE PROMOTED IN THEIR POSITION, IF NOT, THE VICTIM WAS HARASSED UNTIL THEY QUIT OR WAS RELEASED FOR NO VALID REASON.

1974

IN MAY ONE MONTH, I WAS PLACED IN CARRIER CLINIC, A BRAIN SCAN WAS TAKEN AND THE FEMALE DOCTOR LAUGHED, "HA HA, A SWIMMING POOL AND THE "LORD". THIS TIME I WAS PLACED IN AN OPEN SECTION AND AGAIN NO HEARING HAD TAKEN PLACE. PUT UNDER THE CARE OF WILLIAM F. OTIS, JR. HE QUESTIONED ME ABOUT MY PERSONAL LIFE. AGAIN I WAS DRUGGED AND TOOK GROUP WALKS AND QUESTIONED AT DIFFERENT INTERVALS, MY NAME AND ADDRESS WHILE WALKING. HAD ME SPEAK INTO A MICROPHONE. ALSO DURING THIS PERIOD, THEY HAD HAD ANOTHER PATIENT WHO HAD RETURNED, WHOM I RECOGNIZED.

THEY HELD A "RE-UNION" SOCIAL. WHILE WATCHING TV ONE EVENING BY MYSELF, THEY PROGRAMMED A SKIT OF A YOUNG WOMAN LOOKING FOR SCOTLAND YARD

DETECTIVES AND SHE REPEATED "I LOST MY RING, I LOST MY RING". I LEFT THE ROOM, A BLACK MAN WATCHING ME, WHO RAN WHEN I APPROACHED THE DOOR, HE CALLED HIMSELF "BO".

WHILE WALKING THROUGH THE FOYER THAT SEPARATED THE RECREATION AND BEDROOMS, THE PHONE RANG, I ANSWERED, "CARRIER" THE WOMAN ON THE OTHER END LAUGHED AND SAID, "HA HA", CARRIER" THEN HUNG UP. I MADE AN APPOINTMENT WITH THE BEAUTICIAN IN CARRIER AND A DARK HAIRED NURSE FOLLOWED ME IN WHISPERED IN HER EAR. THE BEAUTICIAN REPLIED, WHY DIDN'T SOMEONE TELL ME THIS BEFORE?" THE NURSE LEFT, THE BEAUTICIAN PULLED UP THE SHADE THAT WAS ALWAYS DRAWN. THIS WINDOW OVER LOOKED THE PASSAGE THAT LED OUTSIDE.

AS AN OUT PATIENT OF WILLIAM F. OTIS, JR., MY SISTER ACCOMPANIED ME INTO HIS OFFICE ON CARRIER CLINIC GROUNDS. MY MOTHER STAYED DOWN-STAIRS. MY SISTER SAT HORIZONALLY WITH WILLIAM F. OTIS, JR., I SAT IN AN OBTUSE ANGLE. ALL OF A SUDDEN MY SISTER SAYS, "MY SON CUTS GRASS DOCTOR". DR. OTIS, REPLIED, "THAT'S O.K. HE

CAN CUT GRASS". MY SISTER REPLIED, "SHE HAS A BOYFRIEDN, DOCTOR." OTIS, REPLIED, "OOH, SHE DIDN'T TELL US ABOUT THAT." NOW THIS IS SOME-THING MY SISTER WOULD NEVER DO. I REALIZED SHE HAD BEEN HYPNOTIZED. OTIS RECORDED THIS CON-VERSATION.. I AM STILL UNDER CHEMICAL DRUGGING AND ROBERT JAMES STEWART BECAME MY IMMEDIATE SUPERVISOR IN 1975.

1975

MAY, AFTER I HAD EVERYTHING WORKING ON A DAY TO DAY BASIS, I WAS CALLED INTO THE CONTROLLER'S OFFICE (DONALD MCNABB) APPROXIMATELY ONE HALF HOUR BEFORE QUITTING TIME, ROBERT STEWART, AND LESLIE SCHULTZ, PERSONNEL DIRECTOR, FORCED ME TO TAKE A LESSER JOB, WHERE A NEW SYSTEM IN FREIGHT ACCOUNTING WASTAKING PLACE. MR. SCHULTZ SAID, "YOU DID A GOOD JOB ON THIS AND I'M SURE YOU WILL DO A GOOD JOB ON THIS OTHER ONE." I ASKED WHY THEY WERE DOING THIS, AND ROBERT STEWART, SAID, "THE GIRLS ARE AFRAID OF YOU". I ASKED THE GIRLS AND THEY DENIED SUCH A THING. (THIS WAS ANOTHER MESSED UP JOB).

1975

DURING LUNCH ONE DAY I WAS FOLLOWED BY ROBERT STEWART IN A CAR AND HE PUT ON A GRAY ANIMAL RUBBER MASK AND PULLED ALONG SIDE OF ME AT THE TRAFFIC LIGHT ON HAMILTON AND NOTTINGHAM WAY, TRYING TO SCARE ME OFF THE ROAD. (HE THOUGHT I WAS UNER THE HYPNOSIS) HE DOWNGRADED MY EVALUATION AND WANTED ME TO SIGN IT. I REFUSED. DURING THIS YEAR ROBERT STEWART FOLLOWED ME IN THE HALL, PLACING HIS HANDS ABOVE HIS HEAD AND PUSHING ME AGAINST THE WALL SAYING, "GO SEE A DOCTOR, GO SEE A DOCTOR". PERSONAL INFORMATION WAS GIVEN TO HIM BY ANOTHER EMPLOYEE, DORIS PAUL, WHO BAY SAT FOR HIM AND REFERRED TO HIM AS, "MY SON".

1976

WHILE WORKING AT THE FREIGHT DESK, CHLOROFORM WAS SPEWED FROM THE VENTS, I HAD TO LEAVE QUICKLY, I ALMOST PASSED OUT. HE PLAYED GAMES WITH THE WORK AS HE HYPNOTIZED. AT ONE INTERVAL THE MUSIC APPEARED TO STOP PLAYING AS I STOPPED WRITING AND WOULD

PLAY AS I WROTE.

AUGUST 1976

MY ARTHRITIC MOTHER HAD BECOME ILL AND I ASKED FOR TIME OFF WITHOUT PAY TO CARE FOR HER. I WAS TOLD BY STEWART TO BRING IN A NOTE, FROM A DOCTOR. WHEN I BROUGHT IN THE NOTE, STEWART SAID,"CAN'T YOUR SISTER TAKE CARE OF HER?" I REPLIED, "MY SISTER JUST CAME OUT OF THE HOSPITAL". HE LAUGHED AND SAID, "WAIT 'TILL THEY SEE THIS UPSTAIRS.

WHILE AT HOME THE FIRST TUESDAY, AN ITALIAN ICE TRUCK PARKED DIAGONALLY ACROSS THE STREET FROM MY HOUSE AND PLAYED, "COME JOSEPHINE IN MY FLYING MACHINE." THIS WAS DURING THE MARRIAGE PROGRESSIVE STEP, A CHILD LIVED ACROSS FROM ME, WENT TO BUY THE ICES,AND WAS TURNED AWAY. NO VENDORS SELLING ICES OR ICE CREAM EVER TRAVELLED OUR LOCATION BEFORE NOR AFTER.

THIS TRUCK CAN BE RENTED BY THE ARISTOCRAT ICE CREAM PLACE IN BORDENTOWN, N.J. FOR $15,00 A DAY AND THE TAPES WERE SUPPLIED BY THE INDIVIDUAL WHO RENTED THE TRUCK.

OCTOBER 1976 THE WEEKEND OF HALLOWEEN, I STOPPED IN SHOP RITE ON OLDEN AVENUE IN EWING TOWNSHIP, AND I WAS IN THE PRODUCE DEPARTMENT WHEN THE YOUNG MAN IN THIS SECTION BEGAN TALKING ABOUT MARRIAGE, AS I CAME INTO VIEW, THE MANAGER WENT OVER AN WHISPERED TO HIM AND THE YOUNG MAN REPLIED, "IS IT OVER, IS THE EXPERIMENT OVER ?" HARASSMENTS LIKE THIS WERE CONSTANT.WHENEVER I SHOPPED IN THE SUPER MARKETS. THIS SUBJECT CANNOT BE EMPHASIZED ENOUGH TO COVER THE HARASSMENTS ON PAPER.

AFTER I RETURNED TO WORK IN SEPTEMBER, 1976, ROBERT STEWART, REMARKED, "NOW TO GET HER MARRIED". AFTER THE CHRISTMAS HOLIDAY, HE LOOKED AT MY LEFT HAND TO SEE IF A RING WAS THERE. NONE, HARASSMENTS CONTINUED.

JUNE 1977

I WAS PARKING MY CAR IN THE PARKING LOT WITH MY RADIO STATION TO PRINCETON, AS I TURNED THE SWITCH OFF, A FEMALE VOICE CAME OVER

THE LOUD SPEAKER, SAYING, "WHAT ARE YOU DOING TO MY SON?". THIS WAS THE VOICE OF DORIS PAUL, WHO REFERRED TO STEWART AS "MY SON".

OCTOBER 1977

I WAS TERMINATED BY BRUCE FOULKE, WHO NOW BECAME MY SUPERVISOR , WITH NO VALID REASON GIVEN, HE CALLED ME INTO HIS OFFICE AND WANTED ME TO TEACH A BLACK GIRL, WHOM I HAD TAUGHT ACCOUNTING TO SUPERVISE OVER ME. THIS IS A GIRL WHO HAD WORKED IN THE BILLING SECTION AND THEY WANTED TO FIRE. SHE APPEALED TO ME AND I MADE A REQUEST TO HAVE HER WORK FOR ME. I TOLD BRUCE FOULKE, "IF I HAD TO TEACH HER HOW TO SUPERVISE OVER ME THEN SHE WAS UNQUALIFIED TO SUPERVISE ME. I THEN WROTE A LETTER, TO MR. SCHULTZ, IN PERSONNEL FOR A MEETING. NO MEETING WAS MADE, I THEN TRIED TO TALK TO DONALD MC NABB, THE CONTROLLER, BUT HE WOULD NOT DISCUSS THE MATTER,(THIS MAN WAS ALSO INVOLVED IN THE HARASSMENTS) I WAS THEN TAKEN TO THE PERSONNEL DEPARTMENT,AND DISMISSED

WHERE ONE MAN WAS FORCED INTO RETIREMENT.

TURNOVER OF PERSONNEL WAS CONSTANT, NOT

NORMAL FOR COMPANIES.

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CIVIL PRACTICE: RULES 4:74-7

CIVIL COMMITTMENT

(A) DEFINITIONS THE DEFINITIONS IN N.J.S.A 30.4-23 APPLY TO THIS RULE. THE CLASSES "A" "B" AND "C" REFERRED TO IN THIS RULE ARE THOSE DEFINED BY N.J.S.A. 30:4-36 TO 30:4 38 INCLUSIVE. THE TERM "PATIENT" USED IN THESE RULES MEANS THE PERSON WHOSE COMMITTMENT IS SOUGHT PURSUANT TO SAID STATUTES. THE TERM "PSYCHIATRIST" USED IN THESE RULES MEANS A PHYSICIAN LICENSED IN ANY ONE OF THE UNITED STATES, WHO SHALL BE EITHER CERTIFIED OR ELIGIBLE FOR CERTIFICATION BY THE AMERICAN BOARD OF NEWROLOGY AND PSYCHIATRY.

(B) COMMENCEMENT OF ACTION. AN ACTION FOR COMMITTMENT SHALL BE COMMENCED BY THE FILING OF A WRITTEN APPLICATION, SIGNED BY THE PERSON SEEKING THE COMMITTMENT, TO WHICH SHALL BE ATTACHED THE TYPEWRITTEN OR LEGIBLY HAND PRINTED CERTIFICATES OF TWO

PHYSICIANS LICENSED IN ANY ONE OF THE UNITED STATES. IF THE PATIENT IS AN ADULT., THE CERTIFICATES SHALL STATE WITH PARTICULARITY THE FACTS UPON WHICH THE PHYSICIAN RELIES IN CONCLUDING THAT THE PATIENT IF NOT COMMITTED WOULD BE A PROBABLE DANGER TO HIMSELF OR THE COMMUNITY. IF THE PATIENT IS A MINOR, THE CERTIFICATE MAY STATE, ALTERNATIVELY THE FACTS UPON WHICH THE PHYSICIAN RELIES IN CONCLUDING THAT THE PATIENT IS IN NEED OF INTENSIVE PSYCHIATRIC THERAPY WHICH CANNOT PRACTICALLY OR FEASIBLY BE RENDERED IN THE HOME OR IN THE COMMUNITY OR ON ANY OUT-PATIENT BASIS. THE FORM OF APPLICATION SHALL BE PRESCRIBED BY THE DEPARTMENT OF INSTITUTIONS AND AGENCIES SUBJECT TO THE APPROVAL OF THE ADMINISTRATIVE DIRECTOR OF THE COURTS.

(C) TEMPORARY COMMITTMENT. A TEMPORARY COMMITTMENT MAY BE ORDERED BASED ON THE APPLICATION PROVIDED FOR IN PARA-

GRAPH (B) OF THIS RULE. THE ORDER OF TEMPORARY COMMITMENT SHALL MAKE THE FOLLOWING PROVISIONS:

1. A PLACE AND DAY CERTAIN SHALL BE SET FOR THE COMMITMENT HEARING. WHICH SHALL BE CLASS "A" CASES NOT MORE THAN 20 DAYS FROM THE FILING OF THE APPLICATION, IN CLASS "B" CASES NOT MORE THAN 20 DAYS FROM THE DATE OF THE TEMPORARY COMMITMENT. AND IN CLASS "C" CASES NOT MORE THAN 20 DAYS FROM THE DATE OF ADMISSION OF THE PATIENT INTO THE INSTITUTION. THE DATE SHALL NOT BE SUBJECT TO ADJOURNMENT EXCEPT THAT IN EXCEPTIONAL CIRCUMSTANCES AND FOR GOOD CAUSE SHOWN IN OPEN COURT AND ON THE RECORD THE HEARING MAY BE ADJOURNED FOR A PERIOD OF NOT MORE THAN 10 DAYS.

2. IF THE PATIENT IS UNREPRESENTED, THE TEMPORARY COMMITMENT ORDER SHALL ASSIGN COUNSEL TO REPRESENT HIM. IF THE PATIENT IS A MINOR, A GUARDIAN AD LITEM SHALL

BE APPOINTED TO REPRESENT HIM, WHO SHALL BE A PERSON OTHER THAN THE APPLICANT FOR THE COMMITMENT AND WHO SHALL BE AN ATTORNEY. IF THE COURT, FOR GOOD CAUSE SHOWN, APPOINTS A GUARDIAN AD LITEM WHO IS NOT AN ATTORNEY COUNSEL FOR THE GUARDIAN AD LITEM SHALL ALSO BE APPOINTED. THE GUARDIAN AD LITEM SHALL CONTINUE TO REPRESENT THE MINOR IN RESPECT OF ALL MATTERS ARISING UNDER THIS RULE UNTIL THE MINOR IS EITHER RELEASED OR REACHES HIS MAJORITY AND NO GUARDIAN AD LITEM APPOINTED PURSUANT TO THIS RULE SHALL BE RELIVED WITHOUT COURT ORDER. ASSIGNED COUNSEL AND GUARDIAN AD LITEM FEES SHALL BE FIXED BY THE COURT AFTER HEARING AND PAID PURSUANT TO PARAGRAPH (H) OF THIS RULE.

3. THE PERSONS TO BE NOTIFIED OF THE TIME AND PLACE OF HEARING, THE MODE OF SERVICE OF THE NOTICE, AND THE TIME WITHIN WHICH NOTICE MUST BE SERVED SHALL BE SPECIFIED. IN NO CASE, HOW-

EVER , SHALL NOTICE BE SERVED LESS THAN 10 DAYS PRIOR TO THE DATE OF THEHEARING, NOR SHALL ANY MODE OF SERVICE OF THE NOTICE ON THE PATIENT BE PERMITTED OTHER THAN PERSONAL SERVICE. IN ADDITION TO THE PATIENT AND HIS COUNSEL OR GUARDIAN AD LITEM NOTICE SHALL ALSO BE GIVEN TO THE APPLICANT, THE NEAREST RELATIVES OF THE PATIENT,COUNTY ADJUSTER, AND WHERE THE PATIENT IS CONFINED TO AN INSTITUTION, THE SUPERINTENDENT OF THE INSTITUTION. NOTICE MAY BE FURTHER ORDERED TO BE SERVED ON ANY OTHER PERSON SPECIFIED BY THE COURT. THE FORM OF NOTICE SERVED UPON THE PATIENT AND HIS COUNSEL OR GUARDIAN AD LITEM SHALL INCLUDE A COPY OF THE APPLICATION AND CERTIFICATES EXCEPT THAT IF EITHER PHYSICIAN HAS STATED IN THE CERTIFICATE THAT THE PATIENT'S MENTAL CONDITION WOULD BE ADVERSELY AFFECTED BY HIS RECEIPT THEREOF, THE APPLICATIN AND CERTIFICATES SHALL BE

SERVED ONLY UPON THE PATIENT'S ATTORNEY OR DUARDIAN AD LITEM.

(D) DISCOVERY. ANY RULE, REGULATION OR POLICY OF CONFIDENTIALITY NOTWITHSTANDING THE PATIENT'S COUNSEL OR GUARDIAN AD LITEM SHALL HAVE THE RIGHT TO INSPECT AND COPY ALL RECORDS RELATING TO THE PATIENT'S MENTAL CONDITION. THE COURT MAY DIRECT AN INDEPENDENT PSYCHIATRIC EXAMINATION, OF THE PATIENT. THE COST OF SAID EXAMINATION AND THE PSYCHIATRIST'S FEE FOR TESTIFYING IF ANY, SHALL BE BORNE BY THE PERSON OR PUBLIC BODY CHARGED WITH THE PATIENT'S LEGAL SETTLEMENT.

(C) HEARING. NO PERMANENT COMMITMENT ORDER SHALL BE ENTERED EXCEPT UPON HEARING CONDUCTED IN ACCORDANCE WITH PROVISIONS OF THESE RULES. THE APPLICATION FOR COMMITMENT SHALL BE SUPPORTED BY THE ORAL TESTIMONY OF AT LEAST ONE PSYCHIATRIST LICENSED IN ANY ONE OF THE UNITED STATES WHO SHALL HAVE CONDUCTED

THE TEMPORARY ORDER. THE PATIENT SHALL BE REQUIRED TO APPEAR AT THE HEARING BUT MAY BE EXCUSED FROM THE COURTROOM DURING ALL OR ANY PORTION OF THE TESTIMONY UPON APPLICATION FOR GOOD CAUSE SHOWN. GOOD CAUSE SHALL INCLUDE TESTIMONY BY THE PSYCHIATRIST THAT THE MENTAL CONDITION OF THE PATIENT WOULD BE ADVERSELY AFFECTED BY THE PATIENT HEARING HIS CANDID AND COMPLETE TESTIMONY. THE PATIENT SHALL HAVE THE RIGHT TO TESTIFY IN HIS OWN BEHALF BUT NEED NOT. THE HEARING SHALL BE HELD IN CAMERA UNLESS GOOD CAUSE TO THE CONTRARY IS SHOWN. THE APPLICANT FOR THE COMMITMENT MAY APPEAR EITHER BY COUNSEL RETAINED BY HIM OR BY THE COUNTY ADJUSTER. IN NO CASE SHALL THE PATIENT APPEAR PRO SE.

(F) FINAL JUDGMENT OF COMMITMENT REVIEW. THE COURT SHALL ENTER A JUDGMENT OF COMMITMENT TO AN APPROPRIATE INSTITUTION IF IT

FINDS FROM THE EVIDENCE PRESENTED AT THE HEARING THAT THE INSTITUTIONALIZATION OF THE PATIENT IS REQUIRED BY REASON OF HIS BEING A DANGER TO HIMSELF OR THE COMMUNITY IF HE IS NOT SO CONFINED AND TREATED OR, ALTERNATIVELY, IF THE PATIENT IS A MINOR AND THE COURT FINDS THAT HE IS IN NEED OF INTENSIVE PSYCHIATRIC THERAPY WHICH CANNOT PRACTICALLY OR FEASIBLY BE RENDERED IN THE HOME OR IN THE COMMUNITY OR ON ANY OUT-PATIENT BASIS. IF THE PATIENT IS AN ADULT, THE JUDGMENT SHALL PROVIDE FOR REVIEW OF THE COMMITMENT NO LATER THAN (1) THREE MONTHS FROM THE DATE OF JUDGMENT, AND (2) ON OR BEFORE SIX MONTHS FROM THE DATE OF JUDGMENT, AND (3) ON OR BEFORE ONE YEAR FROM THE DATE OF JUDGMENT, AND (4) AT LEAST ANNUALLY THEREAFTER, IF THE PATIENT IS NOT SOONER DISCHARGED. IF THE PATIENT IS A MONOR, THE COMMITMENT SHALL BE REVIEWED EVERY THREE MONTHS FROM THE DATE OF ITS ENTRY UNTIL THE MINOR IS DISCHARGED OR REACHES HIS MAJORITY,.

ALL REVIEWS SHALL BE CONDUCTED IN THE MANNER REQUIRED BY PARAGRAPH (E) OF THIS RULE EXCEPT THAT IF THE PATIENT HAS BEEN DIAGNOSED AS SUFFERING FROM EITHER SEVERE MENTAL RETARDATION OR SEVERE IRREVERSIBLE ORGANIC BRAIN SYNDROME, ALL REVIEWS AFTER THE EXPIRATION OF TWO YEARS FROM THE DATE OF JUDGMENT MAY BE SUMMARY, PROVIDED ALL PARTIES IN INTEREST ARE NOTIFIED OF THE REVIEW DATE AND PROVIDED FURTHER THAT THE COURT AND ALL INTERESTED PARTIES ARE FURNISHED WITH THE REPORT OF A PHYSICAL EXAMINATION OF THE PATIENT CONDUCTED NO LESS THAN THREE MONTHS PRIOR THERETO.

(G) JUDGMENT OF RELEASE. A JUDGMENT DISCHARGING THE PATIENT MAY CONTAIN IN APPROPRIATE CIRCUMSTANCES CONDITIONS FOR THE RELEASE SUCH AS ATTENDANCE AT A NON-RESIDENTIAL MENTAL HEALTH FACILITY OR OTHER FORM OF SUPERVISION. ANY SUCH

CONDITIONS SHALL BE STATED IN THE ORDER OF DISCHARGE WITH PARTICULARITY. THE CONTINUATION OF ANY SUCH CONDITIONS SHALL BE SUBJECT TO PERIODIC REVIEW AS PROVIDED BY PARAGRAPH (F) HEREOF.

(H) LEGAL SETTLEMENT. THE PATIENT'S LEGAL SETTLEMENT PROVIDING FOR THE PAYMENT OF THE EXPENSE OF HIS CARE AND TREATMENT SHALL BE CONSIDERED EITHER AT THE COMMITMENT HEARING OR AT A HEARING ON NOTICE WHICH MAY BE HELD BY THE COUNTY ADJUSTER THEREAFTER AND REPORTED TO THE COURT. IN EITHER CASE THE SETTLEMENT SHALL BE ON ORDER OF THE COURT. THE PERSON OR PUBLIC BODY CHARGED WITH THE LEGAL SETTLEMENT SHALL ALSO BE CHARGED WITH THE FEE OF ASSIGNED COUNSEL AND GUARDIAN AD LITEM AND NECESSARY COSTS INCURRED BY HIM IN REPRESENTING THE PATIENT. IF THE ASSIGNED COUNSEL OR GUARDIAN AD LITEM IS EMPLOYED BY A LEGAL SERVICES PROJECT, HIS FEE SHALL BE ORDERED PAYABLE THERETO. IF

HE IS EMPLOYED BY THE STATE OR A COUNTY NO FEE ALLOWANCE SHALL BEMADE.

(I) FILING ALL DOCUMENTS REFERRED TO IN THIS RULE SHALL BE FILED IN THE COUNTY CLERK'S OFFICE TOGETHER WITH AN AFFIDAVIT OF SERVICE OF ALL NOTICES HEREIN REQUIRED. THE FILES OF THE COUNTY CLERK SHALL NOT, HOWEVER, BE OPEN TO INSPECTION BY ANY PERSON OTHER THAN ASSIGNED COUNSEL, GUARDIAN AD LITEM AND THE COUNTY ADJUSTER EXCEPT ON COURT ORDER IN EXCEPTIONAL CIRCUMSTANCES AND FOR GOOD CAUSE SHOWN.

A TRUE COPY

CERTIFICATE OF INCORPORATION

OF

CARRIER CLINIC FOUNDATION

THIS IS TO CERTIFY THAT THE UNDERSIGNED DO HEREBY ASSOCIATE THEMSELVES INTO A CORPORATION UNDER AND BY VIRTUE OF THE PROVISIONS OF AN ACT OF THE LEGISLATURE OF THE STATE OF NEW JERSEY, ENTITLED TITLE 15 OF THE REVISED STATUTES. AND THE SEVERAL SUPPLEMENTS THERETO AND ACTS AMENDATORY THEREOF.

FIRST. THE NAME OF THE CORPORATION SHALL BE THE CARRIER CLINIC FOUNDATION

SECOND. THE PRINCIPAL PLACE WHERE THE ACTIVITIES OF THE CORPORATION ARE TO BE CONDUCTED IN BELLE MEAD, MONTGOMERY TOWNSHIP, SOMERSET COUNTY, NEW JERSEY. THE NAME AND POST OFFICE ADDRESS OF THE AGENT UPON WHOM PROCESS AGAINST THIS CORPORATION MAY BE SERVED IS RALPH S. MASON AT 201 NASSAU STREET, PRINCETON NEW JERSEY.

THIRD. THE CORPORATION IS ORGANIZED AND SHALL BE OPERATED EXCLUSIVELY FOR RELIGIOUS, CHARITABLE , EDUCATIONAL AND SCIENTIFIC PURPOSES, AND IT IS AUTHORIZED TO RECEIVE AND MAINTAIN FUNDS, TO HAVE, HOLD, MANAGE AND SELL THE SAME, TO THE INVESTMENTS THEREOF, TO INVEST AND REINVEST THE PROCEEDS THEREOF AND TO COLLECT AND RECEIVE THE INCOME AND PROFITS THEREOF: AND TO APPLY THE INCOME AND PRINCIPAL TO THE AID AND ASSISTANCE OF ANY AND ALL RELIGIOUS, CHARITABLE, EDUCATIONAL AND SCIENTIFIC ORGANIZATIONS AND INSTITUTIONS, AND TO DO ALL THINGS THAT MAY BE NECESSARY AND USEFUL IN THE ACCOMPLISHMENT OF THE PURPOSES HEREINABOVE SET FORTH. ALL THE ASSETS AND EARNINGS SHALL BE USED EXCLUSIVELY FOR THE PURPOSES HEREINABOVE SET OUT, INCLUDING THE PAYMENT OF EXPENSES INCIDENTAL THERETO, AND NO PART OF THE NET EARNINGS SHALL INURE TO THE BENEFIT OF ANY PRIVATE MEMBER OR INDIVIDUAL, AND NO SUBSTANTIAL

PART OF THE ACTIVITIES OF THE CORPORATION SHALL BE FOR THE CARRYING ON OF PROPAGANDA OR OTHERWISE ATTEMPTING TO INFLUENCE LEGISLATION.

FOURTH: THE CORPORATION SHALL HAVE NO CAPITAL STOCK AND THE PRIVATE PROPERTY OF THE INCORPORATORS AND MEMBERS SHALL NOT BE LIABLE FOR THE DEBTS OF THE CORPORATION.

FIFTH: THE MEMBERSHIP OF THE CORPORATION SHALL BE NOT LESS THAN THREE NOR MORE THAN TEN, AND THE ORIGINAL INCORPORATORS SHALL BE THE INITIAL MEMBERS.

SIXTH: THE FOUNDATION IS TO HAVE PERPETUAL EXISTENCE.

SEVENTH: THE NUMBER OF TRUSTEES SHALL NOT BE LESS THAN THREE (3)

EIGHT: THE ORIGINAL INCORPORATORS SHALL BE THE INITIAL TRUSTEES.

NINTH: THE NAMES AND POST OFFICE ADDRESSES OF THE TRUSTEES UNTIL THE FIRST ANNUAL MEETING, AND THE ORIGINAL INCORPORATORS ARE:

MARY H. CARRIER	BOX 65, BELLE MEAD, N.J.
RUSSELL N. CARRIER	BOX 65, BELLE MEAD, N.J
ROBERT S. GARBER	31 FACLER ROAD, PRINCETON, N.J.
RALPH S. MASON	201 NASSAU ST. PRINCETON, N.J.
ANNETTA V. WOROB	3455 HAMILTON AVE., TRENTON, N.J.

IN WITNESS WHEREOF, WE HAVE MADE SUBSCIBED AND ACKNOWLEDGED THIS CERTIFICATE OF INCORPORATION THIS 11TH DAY DECEMBER, 1959

SIGNED, SEALED AND DELIVERED IN THE PRESENCE OF:

ROBERT S. GARBER

MARY H. CARRIER

RALPH MASON

RUSSELL N. CARRIER

ANNETTE V. WOROB

STATE OF NEW JERSEY

SS

COUNTY OF MERCER

BE IT REMEMBERED THAT ON THIS 11TH DAY OF DECEMBER A.D. 1959, BEFORE ME, A NOTARY PUBLIC OF THE STATE OF NEW JERSEY PERSONALLY APPEARED MARY H. CARRIER, RUSSELL N. CARRIER, ROBERT S. GARBER AND RALPH S. MASON, WHO I AM SATISFIED ARE THE PERSONS NAMED IN AND WHO EXECUTED THE FOREGOING CERTIFICATE, AND I HAVING FIRST MADE KNOWN TO THEM THE CONTENTS THEREOF, THEY DID EACH ACKNOWLEDGE THAT THEY SIGNED, SEALED AND DELIVERED THE SAME AS THEIR VOLUNTARY ACT AND DEED.

FRED STEWART, III

NOTARY PUBLIC OF NEW JERSEY. MY COMMISSION EXPIRES DECEMBER 11, 1963

EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

NEWARK DISTRICT OFFICE

740 BORAD STREET ROOM 502

NEWARK, NEW JERSERY 07102

(201) 645-6383

E, DINOLA

302 WESTMORELAND AVE.

TRENTON, N.J. 08618

DEAR MR/MS DINOLA

WE HAVE RECEIVED YOUR INQUIRY CONCERNING FILING A COMPLAINT WITH THE EQUAL EMPLOYMENT OPPORTUNITY COMMISSION (EEOC). BY STATUTE, THE EEOC HAS AUTHORITY TO INVESTIGATE COMPLAINTS OF DISCRIMINATION IN EMPLOYMENT BASED ON RACE, COLOR, RELIGION, SEX, OR NATIONAL ORIGIN AGAINST CERTAIN EMPLOYERS' EMPLOYMENT AGENCIES AND LABOR ORIGANIZATION.

YOUR LETTER INDICATES THAT YOUR SITUATION IS NOT COVERED BY OUR STATUTE AND THEREFORE, WE CANNOT PROCESS YOUR

COMPLAINT.

ALTHOUGH WE CANNOT HANDLE THE MATTER, THE INFORMATION YOU HAVE US SEEMS TO INDICATE THAT ANOTHER ORIGANIZATION MAY BE ABLE TO HELP YOU. PLEASE CONTACT:

THE AMERICAN CIVIL LIBERTIES UNION IN YOUR AREA OR LEGAL SERVICES

IF WE CAN BE OF ANY FURTHER ASSISTANCE, DO NOT HESITATE TO CONTACT US.

SINCERELY

ELVIN BURKS

EQUAL OPPORTUNITY

SPECIALIST

382 WESTMORELAND DRIVE

TRENTON, NEW JERSEY, 08618

MAY 9, 1978

EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

744 BROAD STREET

ROOM 562

NEWARK, NEW JERSEY, 07103

ATTENTION: MR. PHILIP LEE

REGINAL DIRECTOR

DEAR MR. LEE:

I WOULD LIKE VERY MUCH TO DISCUSS A MATTER OF:

1- VIOLATION OF CIVIL RIGHTS REGARDING STATUS

2- VIOLATION OF CIVIL RIGHTS "UNVOLUNTARY TREATMENT REGARDING EMPLOYMENT

THE SUBJECT ALSO PERTAINS TO "ELECTRONIC HYPNOSIS" PERFORMED, UNVOLUNTARILY, WITHOUT MY PERMISSION, CONSENT OR INVITATION. I HAVE BEEN TO ATTORNEYS, N.J. DIV. OF

CIVIL RIGHTS IN TRENTON, N.J. AND TO EMPLOYMENT STANDARD ADMINISTRATION OF DEPARTMENT AND LABOR, TO NO AVAIL. KNOWLEDGE OF ELECTRONICS AND HYPNOSIS IS MOST IMPORTANT TO DISCUSS THIS MATTER. TOO MUCH TIME HAS ELASPED ALREADY.

PLEASE ADVISE TIME AND PLACE FOR THIS DISCUSSION.

ENCLOSING A SELF-ADDRESSED ENVELOPE FOR A SPEEDY REPLY.

VERY TRULY YOURS,

E, DINOLA

ENC.

302 WESTMORELAND DRIVE

TRENTON, NEW JERSEY, 08618

MARCH 25, 1980

OFFICE OF EEOC

U.S. EQUAL EMPLOYMENT OPPORTUNITES

COMMISSIONS

WASHINGTON, D.C. 20201

ATTENTION: DIRECTOR

ON MARCH 11, 1980, I WROTE A LETTER TO YOU CONCERNING A PLACE OF EMPLOYMENT. I WOULD LIKE TO ENTER A COMPLAINT AGAINST THE COMPANY I HAD WORKED FOR AND WAS DISCHARGED. THIS COMPANY USES CRIMINAL METHODS OF HYPNOSIS AND POISONOUS CHEMICALS ON THEIR EMPLOYEES. WHEN THE EMPLOYEE WILL NOT SUBMIT TO THEIR TRANSMITTING OF INSTRUCTIONS UNDER HYPNOSIS, THEY HARASS THE EMPLOYEE AND DISCHARGE THEM.

VERY TRULY YOURS,

E. DINOLA

(RECEIVED NO ANSWER. WENT PERSONALLY

MAY 13,1980. NOTHING WAS DONE.

TALKED TO A MR. WILLIAMS

COMMUNITY HEALTH LAW PROJECT
212 WEST STATE STREET,TRENTON, N.J
08608(609) 392-5553
HAROLD B. GARWIN, ESQ.
EXECUTIVE DIRECTOR
DAVID P. LAZARUS, ESQ.
DIRECTOR OF LITIGATION
STEVEN M. LEDER, ESQ.
MANAGING ATTORNEY

OCTOBER 24, 1984

MS. EMILIA DINOLA
302 WESTMORELAND DRIVE
TRENTON, N.J, 08618

DEAR MS. DINOLA:

I AM WRITING TO REPLY TO YOUR LETTER OF OCTOBER 23, 1984.

UNFORTUNATELY, WE ARE NOT INA POSITION TO PROVIDE YOU WITH ANY ASSISTANCE AT THIS TIME. AS I INDICATED IN MY OCTOBER 10TH LETTER TO KURT GATTERDAM, YOU ARE NOT ELIGIBLE FOR OUR SERVICES. I WOULD SUGGEST YOU CONTACT THE MERCER COUNTY

302 WESTMORELAND DRIVE

TRENTON, NEW JERSEY, 08618

MARCH 11, 1980

OFFICE OF EEOC

U.S. EQUAL EMPLOYMENT OPPORTUNITIES

COMMISSION

WASHINGTON, D.C. 20201

GENTLEMEN:

I HAVE BEEN TO SEVERAL ATTORNEYS IN THIS CITY AND HAVE BEEN DENIED LEGAL REPRESENTATION CONCERNING A CRIMINAL PRACTICE IN MY PLACE OF EMPLOYMENT.

PLEASE ADVISE AS TO WHAT ACTION CAN BE TAKES FOR JUSTIFICATION.

VERY TRULY YOURS,

E, DINOLA

LAWYER REFERRAL SERVICE FOR ASSISTANCE

IN THIS MATTER.

VERY TRULY YOURS,

NICHOLAS. E. ORLYK

SENIOR STAFF ATTORNEY

NEO:SE

302 WESTMORELAND DRIVE

TRENTON, NEW JERSEY, 08618

OCTOBER 23, 1984

MR. NICHOLAS ORLYK

212 WEST STATE STREET

TRENTON, NEW JERSEY, 08608

DEAR MR. ORYLK:

AS YET I HAVE BEEN UNABLE TO OBTAIN LEGAL REPRESENTATION AND, I HAVE DECIDED TO PRESENT THE CASE TO COURT MYSELF. HOWEVER, I NEED SOME ASSISTANCE AS TO THE PROPER FORMS TO FILL OUT FOR COURT.

WOULD IT BE POSSIBLE FOR YOU TO ASSIST ME IN THE TYPE FORMS I WILL NEED. OF COURSE, YOU WILL RECEIVE PAYMENT FOR YOUR HELP.

I WILL APPRECIATE ANY HELP AT ALL. THANKING YOU IN ADVANCE, ENCLOSED, A SELF-ADDRESSED STAMPED ENVELOPE FOR AN EARLY REPLY.

VERY TRULY YOURS,

E. DINOLA

COMMUNITY HEALTH LAW PROJECT
212 WEST STATE STREET, TRENTON, N.J
08608 (609) 392-5553
HAROLD B. GARWIN, ESQ.
EXECUTIVE DIRECTOR
DAVID P. LAZARUS, ESQ.
DIRECTOR OF LITIGATION
STEVEN LEDER, ESQ.
MANAGING ATTORNEY

OCTOBER 10, 1984

MR. KURT GATTERDAM
OFFICE OF THE GOVERNOR
STATE HOUSE
TRENTON, NEW JERSEY 08625

RE: EMILIA DINOLA

DEAR MR. GATTERDAM:

I AM WRITING TO YOUR REQUEST FOR INFORMATION CONCERNING MS. DINOLA'S VISIT TO OUR OFFICE IN SEPTEMBER, 1984. SHE HAS AUTHORIZED ME TO PROVIDE YOU WITH THIS CONFIDENTIAL INFORMATION. MS. DINOLA

CAME TO OUR OFFICE ON SEPTEMBER 13, 1984, TO REQUEST LEGAL REPRESENTATION IN A COMPLEX PERSONAL INJURY CASE INCLUDING ALLEGATIONS THAT A FORMER EMPLOYER AND A MEDICAL CLINIC, TOGETHER WITH VARIOUS STAFF MEMBER, VIOLATED HER CIVIL RIGHTS BY FORCED DRUGGING, HYPNOSIS, HARASSMENT, AND INVASION OF HER PRIVACY.

AT THE CONCLUSION OF OUR DISCUSSION, I INFORMED HER THAT OUR OFFICE COULD NOT ASSIST HER AND REFERRED HER TO THE MERCER COUNTY LAWYER REFERRAL SERVICES. I DID SO FOR TWO REASONS.

FIRST, THE NATURE OF HER PROPOSED SUIT FOR DAMAGES IS FEE GENERATING AND SUCH CASES ARE GENERALLY NOT PERMITTED UNDER THE MANDATES OF THIS OFFICE. THE COMMUNITY HEALTH LAW PROJECT, DUR TO ITS LEGAL SERVICE STATUS, IS NOT ALLOWED TO ACCEPT FEE GENERATING CASES.THAT CAN BE ADEQUATELY

HANDLED BY THE PRIVATE BAR AND WE OFTEN MAKE REFERRALS TO LAWYER REFERRAL SERVICES FOR THIS REASON.

SECOND, MS. DINOLA INDICATED A DESIRE TO HAVE AN ATTORNEY WHO WAS VERY FAMILIAR WITH HYPNOSIS AND HOW FORCED HYPNOSIS ACTIVITIES MIGHT BE ACTIONABLE FOR WRONGFUL INJURY. WHEN I INFORMED HER THAT NEITHER MYSELF NOR ANY OF MY COLLEAQUES IN THIS OFFICE POSSESSED SUCH FAMILIARITY, SHE PREFERRED THAT OUR OFFICE NOT GET INVOLVED IN THIS MATTER, BUT THAT WE ASSIST HER IN LOCATING SUITABLE COUNSEL. I BELIEVE THE LAWYER REFERRAL SERVICE WOULD HAVE ACCESS TO SUCH SPECIALTIES PREFERRED BY MS. DINOLA.

IF I CAN PROVIDE YOU WITH ANY ADDITIONAL INFORMATION, PLEASE DO NOT HESITATE TO CONTACT ME

VERY TRULY YOURS,

NICHOLAS E. ORLYK

SENIOR STAFF ATTORNEY

NEO:AMM

CC: EMILIA DINOLA

DEPARTMENT OF LABOR EMPLOYMENT STANDARDS ADMINISTRATION

WAGE AND HOUR DIVISION

WASHINGTON, D.C.20210

MR. E. DINOLA

302 WESTMORELAND DRIVE

TRENTON, NEW JERSEY 08618

DEAR MR. DINOLA:

WE REGRET TO INFORM YOU THAT THE U.S. DEPARTMENT OF LABOR HAS NO JURISDICTION OVER THE SITUATION YOU DESCRIBE. FURTHER, WE ARE NOT AWARE OF ANY OTHER FEDERAL AGENCY WHICH WOULD BE ABLE TO PROVIDE ASSISTANCE TO YOU.

WE HOPE YOUR SITUATION WILL BE RESOLVED FAVORABLY.

SINCERELY,

STEPHANIE R. GLYDER, CHIEF

BRANCH OF FAIR LABOR STANDARDS

ACT ENFORCEMENT

STATE OF NEW JERSEY

OFFICE OF THE GOVERNOR

CN-001

08625

THOMAS H. KEAN

GOVERNOR

AUGUST 20, 1984

MR. E. DINOLA

302 WESTMORELAND DRIVE

TRENTON, NEW JERSEY, 08618

DEAR MS. DINOLA:

I HAVE RECEIVED YOUR LETTER REGARDING YOUR PROBLEM WITH THE DIVISION OF CRIMINAL JUSTICE. I WILL BE HAPPY TO LOOK INTO THE SITUATION YOU HAVE DESCRIBED. HOWEVER, YOUR SPECIFIC REQUEST IS SOMEWHAT UNCLEAR.

PLEASE GET IN TOUCH WITH MY ASSISTANT KURT GATTERDAM AT (609) 292-6000 EXTENSION 238. BE ASSURED THE NECESSARY STEPS WILL BE TAKEN TO ADDRESS YOUR INQUIRY AS SOON AS MY OFFICE HAS HEARD FROM YOU.

SINCERELY

GOVERNOR THOMAS H. KEAN

NEW JERSEY BAR ASSOCIATION HEADQUARTERS
172 WEST STATE STREET
TRENTON, N.J. 08608 609-394-1101

JUNE 27, 1979

MR. E. DINOLA
302 WESTMORELAND DRIVE
TRENTON, NEW JERSEY, 08618

DEAR MR. DINOLA:

I RECEIVED YOUR LETTER OF JUNE 12, 1979. AS I INDICATED TO YOU PRIOR CORRESPONDENCE, THERE IS NO ONE IN THIS OFFICE WHO IS PERMITTED TO PROVIDE YOU WITH LEGAL ADVICE OR RECOMMEND THE NAME OF A SPECIFIC ATTORNEY TO ASSIST YOU. IF YOU CONTACT THE MERCER COUNTY LAWYER REFERRAL SERVICE AND REQUEST THE NAME OF AN ATTORNEY WHO HANDLES CRIMINAL MATTERS, THEY SHOULD BE ABLE TO REFER YOU TO AN APPROPRIATE INDIVIDUAL.

VERY TRULY YOURS,

RICHARD H. STEEN
STAFF ATTORNEY

RHS/MJM

U.S. DEPARTMENT OF JUSTICE

WBR:DCR:FMM

DJ 144-48-0

WASHINGTON, D.C. 20530

JUNE 26, 1984

MS. E. DINOLA

302 WESTMORELAND DRIVE

TRENTON, NEW JERSEY, 08618

DEAR MS. DINOLA:

THIS IS IN REPLY TO YOUR CORRESPONDENCE. WE APOLOGIZE FOR THE DELAY IN THIS RESPONSE.

THE MATTER WITH WHICH YOU ARE CONCERNED IS ONE WITHIN THE JURISDICTION OF THE COURTS OR THE STATE. THIS DEPARTMENT HAS NO AUTHORITY TO TAKE ANY ACTION.

SINCERELY

WM. BRADFORD REYNOLDS

ASSISTANT ATTORNEY GENERAL

CIVIL RIGHTS DIVISION

BY: DIANE C, ROBERTS

CIVIL RIGHTS DIVISION

NEW JERSEY BAR ASSOCIATION HEADQUARTERS

172 WEST STATE STREET

TRENTON, N.J. 08608 609-394-1101

MAY 23, 1979

MR. E. DINOLA

302 WESTMORELAND DRIVE

TRENTON, N.J 08618

DEAR MR. DINOLA:

THIS OFFICE RECEIVED YOUR LETTER OF MAY 18,1979. UNFORTUNATELY, THERE IS NO ONE HERE PERMITTED TO GIVE LEGAL ADVICE OF THE TYPE WHICH YOU SEEK.

IF YOU DESIRE TO OBTAIN THE SERVICES OF AN ATTORNEY TO ASSIST YOUM PLEASE CONTACT MERCER COUNTY LAWYER REFERRAL SERVICE AT (609) 989-8880.

VERY TRULY YOURS

RICHARD H. STEEN

STAFF ATTORNEY

RHS/MJM

302 WESTMORELAND DRIVE

TRENTON, NEW JERSEY,

08618

OCTOBER 29, 1984

HONORABLE MARGARET HECKLER

SECY. HEALTH AND HUMAN SERVICES

DEPT. OF HUMAN SERVICES

WASHINGTON, D.C. 20201

DEAR HONORABLE HECKLER:

I HAVE BEEN AN UN-AUTHORIZED EXPERIMENTATION SUBJECT IN A COMPANY IN WHICH I WORKED.

WHEN I APPLIED FOR THE POSITION, NO MENTION WHATSOEVER WAS MADE AS AN EXPERIMENTAL TOOL. I NEITHER GAVE CONSENT, INVITED NOR DID I VOLUNTEER FOR SUCH A PROJECT. I WORKED IN ACCOUNTING. I HAVE BEEN DENIED MY RIGHT TO LEGAL REPRESENTATION IN THIS CITY AND OTHERWISE. ATTORNEYS ARE BEING PRE-WARNED BY TELEPHONE, NOT TO PURSUE LITIGATION. AS SOON AS I ENTER INTO THE ATTORNEY'S OFFICE THEY RECEIVE A PHONE CALL, THE ATTORNEY TURNS

TO ME AND STATES, "I CANNOT HELP YOU" WITH OUT ME UTTERING A WORD TO STATE MY CASE.

I WILL APPRECIATE AN APPOINTMENT WITH YOU TO DISCUSS THIS MATTER FURTHER.

RESPECTFULLY YOURS,

E. DINOLA

LAW OFFICE

AARON J. BRODER

EMPIRE STATE BUILDING

350 FIFTH AVENUE

NEW YORK, NEW YORK, 10118

SUITE 4710

(212) 244-2000

OCTOBER 29, 1984

MS. E. DINOLA

302 WESTMORELAND DRIVE

TRENTON, NEW JERSEY, 08618

RE: CHEMICAL SUBSTANCE

ON THE JOB

DEAR MS. DINOLA:

YOU RECENTLY INQUIRED WHETHER THIS OFFICE WOULD UNDERTAKE REPRESENTATION IN CONNECTION WITH THE ABOVE-CAPTIONED MATTER. AFTER CAREFUL CONSIDERATION, WE REGRET THAT WE ARE UNABLE TO ACCEPT THIS REPRESENTATION. THIS DECISION ON OUR PART SHOULD NOT BE CONSTRUED BY YOU AS A REFLECTION UPON THE MERITS OF THE CASE. WE TRUST YOU WILL OBTAIN OTHER COUNSEL FOR THIS MATTER.

SHOULD YOU HAVE ANY QUESTIONS, PLEASE DO NOT HESITATE TO CONTACT THE UNDERSIGNED. WITH THIS CORRESPONDENCE, WE ARE CLOSING OUR FILE ON THIS MATTER.

VERY TRULY YOURS

ALLEN MICHELSON

MANAGING ATTORNEY

AM/MR

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

302 WESTMORELAND DRIVE

TRENTON, NEW JERSEY, 08618

OCTOBER 24, 1984

BAILEY AND BRODER

350 FIFTH AVENUE

NEW YORK CITY, NEW YORK, 1000

ATTENTION: MR. F. LEE BAILEY

DEAR MR. BAILEY:

I HAVE BEEN TRYING TO OBTAIN REPRESENTATION FROM MANY ATTORNEYS IN THE CITY OF TRENTON AND OTHERWISE. EACH TIME I ENTER AN ATTORNEY'S OFFICE, HE RECEIVES A PHONE CALL, TURNS TO ME AND SAYS, "I CAN'T HELP YOU", WITHOUT ME UTTERING A WORD.
I WORKED FOR A COMPANY THAT USES CHEMICAL INDUCEMENT FOR HYPNOSIS ON THEIR UN-SUSPECTING EMPLOYEES.

I WAS A VICTIM. MY IMMEDIATE SUPERVISOR ABD THE COMPANY REALIZED, I WAS AWARE OF THE

THINGS THEY WERE DOING TO THE EMPLOYEES AND I WAS TERMINATED.

THIS CASE IS TOO INVOLVED TO DISCUSS ON PAPER.

I WOULD APPRECIATE AN APPOINTMENT TO DISCUSS THIS MATTER FURTHER.

ENCLOSED A SELF-ADDRESSED STAMPED ENVELOPE FOR AN EARLY REPLY.

VERY TRULY YOURS,

E. DINOLA

ENC.

PITNEY, HARDIN, KIPP & SZUCH

163 MADISON AVENUE

CN 1945

MORRISTOWN, NEW JERSEY, 07960-1945

NEW YORK (212) 926-0331

WRITER'S DIRECT DIAL NUMBER

(201) 631- 4863

MARCH 1, 1985

MS. EMILIA DINOLA

302 WESTMORELAND DRIVE

TRENTON, NEW JERSEY 08618

RE: DINOLA v. AMERICANCYANAMID, ET AL

CIVIL ACTION NO 84-372 (MTB)

DEAR MS. DINOLA:

ENCLOSED IS A COPY OF AN ORDER DISMISSING THE COMPLAINT IN THE ABOVE MATTER. WOULD YOUR KINDLY ACKNOWLEDGE SERVICE OF THIS ORDER BY AFFIXING YOUR SIGNATURE TO THE BOTTOM OF THE ENCLOSED LETTER AND RETURNING IT TO OUR OFFICE IN THE ENVELOPE PROVIDED FOR YOUR CONVENIENCE.

VERY TRULY YOURS,

SCOTT K. GOODELL

SKG/FW

ENCLOSURES

RECEOVED TJOS DAY OF MARCH, 1985

EMILIA DINOLA

CHUBB GROUP OF INSURANCE COMPANY

EXT. 135

MARCH 1, 1985

EMILIA DINOLA

302 WESTMORELAND DRIVE

TRENTON, N.J., 08618

RE: DINOLA VS. OTIS

POLICY #7911-9095

VENUE: UNITED STATES DISTRICT COURT

TRENTON

D/L: 5/15/78

DOCKET# 85-372-(MTB)

DEAR MS. DINOLA:

PLEASE BE ADVISED THAT THE ABOVE-CAPTIONED CASE HAS BEEN ASSIGNED TO STEPHEN SCHECHNER, 966 SOUTH SPRINGFIELD AVENUE, SPRINGFIELD, N.J. HE WILL CONTACT YOU IN THE NEAR FUTURE.

I THANK YOU FOR YO UR TIME IN THIS MATTER.

VERY TRULY YOURS,

CHUBB & SON, INC.

JEWELL FOUCHE

MEDICAL LIABILITY

DEPARTMENT

JF:DG